# Exhibit B1

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1	UNITED STATES DISTRICT COURT
2	SOUTHERN DISTRICT OF NEW YORK
3	x
4	EASTERN PROFIT CORPORATION LIMITED,
5	Plaintiff-Counterclaim Defendant,
6	Case No.
7	-against- 18-cv-2185 JGK
8	STRATEGIC VISION US, LLC,
9	Defendant-Counterclaim Plaintiff,
10	vs.
11	GUO WENGUI a/k/a, MILES KWOK,
12	Counterclaim Defendant.
13	x
14	
15	
16	VIDEOTAPED DEPOSITION
17	OF
18	FRENCH WALLOP
19	New York, New York
20	Tuesday, February 12, 2019
21	
22	
23	
24	
25	

	Trench wanop		
1	Page 6	1	Page 8 FRENCH WALLOP, called as a witness, having been
2	WALLOP DESCRIPTION PAGE	2	first duly sworn by a Notary Public of the State
3	Exhibit 19 Strategic Vision's Responses 262	3	of New York, testifies as follows:
4	and Objections to		
5	Plaintiff's First Set of	4	EXAMINATION BY
6	Interrogatories	5	MR. GRENDI:
7	Exhibit 20 Strategic Vision's 271	6	Q. Good morning, Ms. Wallop. I'm Zach
8	Supplemental and Amended	7	Grendi, as you just heard, counsel for Eastern
9	Response and Objections to	8	Profit. I'm just going to be asking you some
10	Plaintiff's First Set of	9	questions today.
11	Interrogatories	10	Just for the courtesy of the court
12	Exhibit 21 Amended Answer and 275	11	reporter and the clarity of the record, I'm just
13	Counterclaims	12	going to ask that, please wait until after I
14	(Exhibits retained by Counsel.)	13	finish asking a question to answer it. Unlike in
15	(Exhibits retained by Counsel.)	14	normal conversation, in a deposition you need to
	(*~) DOCUMENTED DEOLIGIED.	15	allow one person to stop talking and the other
16	(*r) DOCUMENTS REQUESTED: Page: 118 11	16	person to start.
17		17	Also, shrugs and nods are things that
1.0	Page: 253 22	18	the court reporter can't take down, so I ask that
18	Page: 273 6	19	you please answer all questions verbally. And if
19		20	you need a break, just let me know, let anyone
20		21	
21			know, we can take one. We're going to try to
22		22	move through this these materials as quickly
23		23	as possible, but breaks are allowed.
24		24	A. Thank you.
25		25	Q. What's your full legal name?
	Page 7		Page 9
1 1	THE VIDEOGRAPHER: Good morning. This	1	
1	_		A. French Carter Wallop.
2	is the beginning of media 1 in the	2	Q. And where do you reside?
	_		Q. And where do you reside?  A. 1557 North 22nd Street, Arlington,
2	is the beginning of media 1 in the	2	Q. And where do you reside?
2 3	is the beginning of media 1 in the deposition of French Wallop, in the matter	2 3	Q. And where do you reside?  A. 1557 North 22nd Street, Arlington,
2 3 4	is the beginning of media 1 in the deposition of French Wallop, in the matter of Eastern Profit Corporation Limited versus	2 3 4	Q. And where do you reside?  A. 1557 North 22nd Street, Arlington, Virginia 22209.
2 3 4 5	is the beginning of media 1 in the deposition of French Wallop, in the matter of Eastern Profit Corporation Limited versus Strategic Vision US, LLC.	2 3 4 5	Q. And where do you reside? A. 1557 North 22nd Street, Arlington, Virginia 22209. Q. And
2 3 4 5 6	is the beginning of media 1 in the deposition of French Wallop, in the matter of Eastern Profit Corporation Limited versus Strategic Vision US, LLC. Today's date is February 12, 2019. My	2 3 4 5 6	Q. And where do you reside? A. 1557 North 22nd Street, Arlington, Virginia 22209. Q. And A. And I also have a Wyoming address.
2 3 4 5 6 7	is the beginning of media 1 in the deposition of French Wallop, in the matter of Eastern Profit Corporation Limited versus Strategic Vision US, LLC.  Today's date is February 12, 2019. My name is Jaysun Loushin, I am the	2 3 4 5 6 7	Q. And where do you reside?  A. 1557 North 22nd Street, Arlington,  Virginia 22209.  Q. And  A. And I also have a Wyoming address.  Q. Do you have a Las Vegas address?
2 3 4 5 6 7 8	is the beginning of media 1 in the deposition of French Wallop, in the matter of Eastern Profit Corporation Limited versus Strategic Vision US, LLC.  Today's date is February 12, 2019. My name is Jaysun Loushin, I am the videographer, and the court reporter is	2 3 4 5 6 7 8	Q. And where do you reside? A. 1557 North 22nd Street, Arlington, Virginia 22209. Q. And A. And I also have a Wyoming address. Q. Do you have a Las Vegas address? A. Yes.
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	French wallop		
1	Page 10 four years. And then I was at the Ecole	1	Page 12 Dr. Waller?
2	D'Interpretes in Geneva. And then I came back to	2	A. I would say in the last year and a
3	Georgetown University and got my linguistic's	3	half.
4	degree in simultaneous interpreting.	4	Q. And how did that come about?
5	Q. Anything else?	5	A. We had an I had an introduction by
6	A. I did I didn't finish, but I went to	6	Bill Gertz and Lianchao Han regarding this
7	SAIS, The School of Advanced International Study,	7	particular client. I'm not sure, by the way, how
8	which is part of Johns Hopkins; so it doesn't	8	to refer to this client. We've referred to him
9	count as a degree, sadly.	9	as Miles Guo, G-u-o.
10	Q. What about your work experience, let's	10	Q. Eastern Profit is fine.
11	just say the last 20 years or so?	11	MR. SCHMIDT: Well, you know, you refer
12	A. Oh, my goodness.	12	to him however you think the client is.
13	Q. You don't have to say everything. Just	13	A. He has about six names, so I'm not sure
14	an overview.	14	what goes into the record.
15	A. Well, I've run two companies, and	15	Q. Whatever you know.
16	plus and I sold them in 2000. And then in	16	A. We refer to him as Miles Guo. But I
17	about 2005, I started up my Strategic Vision	17	was referred to him by both Bill Gertz, the
18	group.	18	Washington Times and the Free Beacon, and
19	Q. In 2005, starting Strategic Vision, is	19	Lianchao. And I when they approached me,
20	that what you've been doing ever since?	20	that's when I decided Mike was one of the people
21	A. Yes.	21	I really wanted to work with on this.
22	Q. Any other employment that you have or	22	Q. But I wanted to ask you. Have you ever
23	businesses that you're running, other than	23	worked with Dr. Waller on any investigatory
24	Strategic Vision?	24	research before, as you said, you were introduced
25	A. Yes. I have another company that's	25	to Mr. Guo?
	D 11	_	
	Page 11		Page 13
1	called Regency Mayfair Worldwide, and that works	1	A. No. No.
2	called Regency Mayfair Worldwide, and that works overseas on projects.	2	A. No. No. Q. Since you were introduced to Mr. Guo,
2 3	called Regency Mayfair Worldwide, and that works overseas on projects.  Q. What kind of projects?	2 3	A. No. No. Q. Since you were introduced to Mr. Guo, have you and Dr. Waller worked on any other
2 3 4	called Regency Mayfair Worldwide, and that works overseas on projects.  Q. What kind of projects?  A. Family office groups.	2 3 4	A. No. No. Q. Since you were introduced to Mr. Guo, have you and Dr. Waller worked on any other investigatory research together for another
2 3 4 5	called Regency Mayfair Worldwide, and that works overseas on projects.  Q. What kind of projects?  A. Family office groups.  Q. What do you mean by that? What kind of	2 3 4 5	A. No. No. Q. Since you were introduced to Mr. Guo, have you and Dr. Waller worked on any other investigatory research together for another client? You don't have to name them.
2 3 4 5 6	called Regency Mayfair Worldwide, and that works overseas on projects.  Q. What kind of projects?  A. Family office groups.  Q. What do you mean by that? What kind of projects do you do for family office groups	2 3 4 5 6	A. No. No. Q. Since you were introduced to Mr. Guo, have you and Dr. Waller worked on any other investigatory research together for another client? You don't have to name them. A. I can't name them.
2 3 4 5 6 7	called Regency Mayfair Worldwide, and that works overseas on projects.  Q. What kind of projects?  A. Family office groups.  Q. What do you mean by that? What kind of projects do you do for family office groups through this Mayfair company?	2 3 4 5 6 7	A. No. No. Q. Since you were introduced to Mr. Guo, have you and Dr. Waller worked on any other investigatory research together for another client? You don't have to name them. A. I can't name them. Q. No, I'm saying whether you have or have
2 3 4 5 6 7 8	called Regency Mayfair Worldwide, and that works overseas on projects.  Q. What kind of projects?  A. Family office groups.  Q. What do you mean by that? What kind of projects do you do for family office groups through this Mayfair company?  A. Investment investment advisory.	2 3 4 5 6 7 8	A. No. No. Q. Since you were introduced to Mr. Guo, have you and Dr. Waller worked on any other investigatory research together for another client? You don't have to name them. A. I can't name them. Q. No, I'm saying whether you have or have not provided
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2 3 4 5 6 7 8 9	called Regency Mayfair Worldwide, and that works overseas on projects.  Q. What kind of projects?  A. Family office groups.  Q. What do you mean by that? What kind of projects do you do for family office groups through this Mayfair company?  A. Investment investment advisory.  Q. Okay. So nothing to do with investigatory research or things of that nature?	2 3 4 5 6 7 8 9	A. No. No. Q. Since you were introduced to Mr. Guo, have you and Dr. Waller worked on any other investigatory research together for another client? You don't have to name them. A. I can't name them. Q. No, I'm saying whether you have or have not provided A. Yes. Q a service to another client?
2 3 4 5 6 7 8 9 10	called Regency Mayfair Worldwide, and that works overseas on projects.  Q. What kind of projects?  A. Family office groups.  Q. What do you mean by that? What kind of projects do you do for family office groups through this Mayfair company?  A. Investment investment advisory.  Q. Okay. So nothing to do with investigatory research or things of that nature?  A. No.	2 3 4 5 6 7 8 9 10	A. No. No. Q. Since you were introduced to Mr. Guo, have you and Dr. Waller worked on any other investigatory research together for another client? You don't have to name them. A. I can't name them. Q. No, I'm saying whether you have or have not provided A. Yes. Q a service to another client? A. Yes, but yes.
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Page 14  1 THE WITNESS: Approximately, yeah.  2 MR. GRENDI: I'm going to ask that you 2 Q. You don't understand 3 not try to interrupt.  3 A. No, I don't understand 4 MR. SCHMIDT: I'm trying to keep you 4 Q. Okay. What I'm sayi 5 guys moving forward. 5 stop working with someone else 6 MR. GRENDI: I appreciate that, but I'm 7 A. I didn't say I had s	Page 16
not try to interrupt.  3 A. No, I don't understa 4 MR. SCHMIDT: I'm trying to keep you 5 guys moving forward. 6 MR. GRENDI: I appreciate that, but I'm 7 A. I didn't say I had s	C
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6 MR. GRENDI: I appreciate that, but I'm 6 providing investigatory research 7 not trying to 7 A. I didn't say I had s	ng is, when did you
7 not trying to 7 A. I didn't say I had s	in terms of
	h?
	topped.
8 MR. SCHMIDT: I think you knew what she   8 Q. So you work with, co	ncurrently, other
9 meant and kind of accused her of refusing to 9 individuals who provide investi	gatory research
10 answer. I don't think that was appropriate, 10 for Strategic Vision?	
so that's when I had to step in, okay? 11 A. From time to time.	
12 MR. GRENDI: I didn't think that that's 12 Q. Okay. So you don't	have an exclusive
13 what I was doing. I was   13 relationship with Dr. Waller in	
MR. SCHMIDT: Okay. That's how it was 14 investigatory research that he	provides?
15 coming across on the record, so I clarified 15 A. No.	
16 it. 16 Q. Okay. You said that	you founded
17 MR. GRENDI: Okay. Fair enough. 17 Strategic Vision in 2005?	
18 Q. So you and Dr. Waller have worked on 18 A. I think so. I'd hav	e to look.
19 approximately five different investigatory 19 Q. Okay. Was anyone el	se involved in the
20 research projects with Strategic Vision? 20 company at the time?	
21 A. Yes. 21 A. No.	
22 Q. And none of them preceded your 22 Q. So it's always been	your company?
23 introduction to Mr. Guo? 23 A. Yes.	
24 A. No. 24 Q. And you've never had	any other
25 Q. No, they did not precede 25 officers?	-
Page 15   1 A. No.   1 A. No.	Page 17
2 Q or 2 Q. Or directors?	
3 A. They did not. 3 A. No.	
4 Q. Prior to working with Dr. Waller, did 4 Q. Or unit holders?	
5 you work with someone else in terms of 5 A. No.	
	other principals of
	u.
7 A. When? 7 Strategic Vision, other than yo	
7 A. When? 7 Strategic Vision, other than yo 8 Q. Before you started working with 8 A. No.	in Strategic
7 A. When? 7 Strategic Vision, other than yo 8 Q. Before you started working with 8 A. No. 9 Dr. Waller, so let's say prior to a year and a 9 Q. So what's your role	ın Strategic
7 A. When? 7 Strategic Vision, other than yo 8 Q. Before you started working with 8 A. No. 9 Dr. Waller, so let's say prior to a year and a 10 half ago. 10 Vision?	_
7 A. When? 8 Q. Before you started working with 9 Dr. Waller, so let's say prior to a year and a 10 half ago. 11 A. Yes. 7 Strategic Vision, other than yo 8 A. No. 9 Q. So what's your role 10 Vision? 11 A. I run certain adviso	ry clients and work
7 A. When? 8 Q. Before you started working with 9 Dr. Waller, so let's say prior to a year and a 10 half ago. 11 A. Yes. 12 Q. And was it just one entity or several 17 Strategic Vision, other than your started working with 8 A. No. 9 Q. So what's your role 10 Vision? 11 A. I run certain adviso	ry clients and work
7 A. When? 8 Q. Before you started working with 9 Dr. Waller, so let's say prior to a year and a 10 half ago. 11 A. Yes. 12 Q. And was it just one entity or several 13 entities? 7 Strategic Vision, other than your started working with 8 A. No. 9 Q. So what's your role 10 Vision? 11 A. I run certain adviso 12 with them as clients, private of the started working with 13 Q. Do you have a title,	ry clients and work lients. like CEO?
7 A. When? 8 Q. Before you started working with 9 Dr. Waller, so let's say prior to a year and a 10 half ago. 11 A. Yes. 12 Q. And was it just one entity or several 13 entities? 14 A. I can't remember. 17 Strategic Vision, other than yo 8 A. No. 9 Q. So what's your role 10 Vision? 11 A. I run certain adviso 12 with them as clients, private of the several of the se	ry clients and work lients. like CEO?
7 A. When? 8 Q. Before you started working with 9 Dr. Waller, so let's say prior to a year and a 10 half ago. 11 A. Yes. 12 Q. And was it just one entity or several 13 entities? 14 A. I can't remember. 15 Q. Without going into any detail. Was 17 Strategic Vision, other than your several and a	ry clients and work lients. like CEO?
7 A. When? 8 Q. Before you started working with 9 Dr. Waller, so let's say prior to a year and a 10 half ago. 11 A. Yes. 12 Q. And was it just one entity or several 13 entities? 14 A. I can't remember. 15 Q. Without going into any detail. Was 16 that a similar arrangement to your arrangement 17 Strategic Vision, other than your Strategic Vision, other than your approach is a constant of the policy of the provide to its clients, private of the provide to its clients?	ry clients and work lients. like CEO? O. s Strategic Vision
7 Strategic Vision, other than you 8 Q. Before you started working with 8 A. No. 9 Dr. Waller, so let's say prior to a year and a 9 Q. So what's your role 10 half ago. 10 Vision? 11 A. Yes. 11 A. I run certain adviso Q. And was it just one entity or several 12 with them as clients, private continues? 13 Q. Do you have a title, A. I can't remember. 14 A. Yes, I think it's CE Q. Without going into any detail. Was 15 Q. So what services doe 16 that a similar arrangement to your arrangement 16 provide to its clients? 17 with Dr. Waller in terms of the provisioning of 17 A. I've already answere	ry clients and work lients. like CEO? O. s Strategic Vision d that.
7 Strategic Vision, other than you shart of the provision	ry clients and work lients. like CEO? 0. s Strategic Vision d that. ve.
A. When?  Q. Before you started working with  Pr. Waller, so let's say prior to a year and a  10 half ago.  11 A. Yes.  12 Q. And was it just one entity or several  13 entities?  14 A. I can't remember.  15 Q. Without going into any detail. Was  16 that a similar arrangement to your arrangement  17 Strategic Vision, other than your several and a point of the provisioning of the provision and the provision of the provision and the provision of the provision of the provision and the provision of	ry clients and work lients. like CEO? 0. s Strategic Vision d that. ve. ices.
A. When?  Q. Before you started working with  Pr. Waller, so let's say prior to a year and a  10 half ago.  11 A. Yes.  12 Q. And was it just one entity or several  13 entities?  14 A. I can't remember.  15 Q. Without going into any detail. Was  16 that a similar arrangement to your arrangement  17 with Dr. Waller in terms of the provisioning of  18 investigatory research?  19 A. No.  20 Q. How was it different?  7 Strategic Vision, other than you  8 A. No.  9 Q. So what's your role  10 Vision?  11 A. I run certain adviso  12 with them as clients, private of  13 Q. Do you have a title,  14 A. Yes, I think it's CE  15 Q. So what services doe  16 provide to its clients?  17 A. I've already answere  18 Q. I don't think you ha  19 A. I said advisory serv  20 Q. What do you mean by	ry clients and work lients. like CEO? 0. s Strategic Vision d that. ve. ices. advisory services?
A. When?  Q. Before you started working with  Pr. Waller, so let's say prior to a year and a  Dr. Waller, so let's your role  Dr. Wision?  Dr. Waller, so let's say prior to a year and a  Dr. Waller, so let's your role  Dr. Wision?  Dr. Waller, so let's your role  Dr. Waller, so what's your role  Dr. Wal	ry clients and work lients. like CEO? 0. s Strategic Vision d that. ve. ices. advisory services? ices.
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A. When?  Q. Before you started working with  Pr. Waller, so let's say prior to a year and a  No.  Q. So what's your role  No.  Q. And was it just one entity or several  A. I can't remember.  Q. Without going into any detail. Was  Manualler in terms of the provisioning of  Investigatory research?  A. I can't remember.  A. No.  Private gic Vision, other than your several and a great point of the provision of the	ry clients and work lients. like CEO? 0. s Strategic Vision d that. ve. ices. advisory services? ices.
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	French Wallop	OII	02/12/2017
1	Page 18 involve?	1	Page 20 A. No.
2	A. Exactly as it says. Each client is	2	O. Who does?
3	different, isn't it?	3	A. Whomever we bring on board to do the
4	Q. Right. What I'm asking is, what does	4	investigation.
5	Strategic Vision's investigatory research	5	Q. So Strategic Vision hires independent
6	services entail?	6	contractors?
7	A. Every client is different.	7	A. Our own team of people that we have
8	Investigatory services is exactly that, depending	8	worked with off and on through the years, yes.
9	upon how you want to define investigations.	9	Q. Do you or Strategic Vision provide any
10	Q. How does Strategic Vision provide that	10	input or edits to any of the reports? I mean,
11	service, what does it do?	11	what does Strategic do in terms of
12	A. Investigate.	12	A. We review the reports.
13	Q. How?	13	Q. Do you ever edit them?
14	A. The usual ways.	14	A. I wouldn't say edit them, no.
15	Q. What are the usual ways?	15	Q. How does Strategic Vision contribute to
16	A. I find it's a repetitive question.	16	the end work product of an investigatory research
17	Q. I don't care if you find it a	17	report?
18	repetitive question. What I'm asking you to do	18	A. Well, when we get them, we look at them
19	is answer my question.	19	and we read them, depending upon who the teams
20	I want to know how Strategic Vision	20	are, and discuss them, and then produce them.
21	performs investigations?	21	Sometimes they can be verbal, sometimes they can
22	A. We look everybody up on Facebook.	22	be on flash drives. It depends what the client
23	Q. That's it?	23	needs.
24	A. Sure. It's an idiotic question.	24	Q. Does Strategic Vision well, let me
25	MR. SCHMIDT: Don't comment. Just	25	ask you this. Strike that.
			D 01
1	Page 19 answer the question.	1	Page 21  Do you ever access a network of
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2	answer the question. Q. Excuse me, ma'am, I'm just trying to	1 2 3	Do you ever access a network of individuals that you're familiar with to get
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2 3	answer the question.  Q. Excuse me, ma'am, I'm just trying to understand things. And I think maybe you don't understand how a deposition works, but I'm	2 3	Do you ever access a network of individuals that you're familiar with to get information for investigatory research?  A. Sometimes.
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2 3 4 5 6	answer the question.  Q. Excuse me, ma'am, I'm just trying to understand things. And I think maybe you don't understand how a deposition works, but I'm just trying to understand basic information. You might think something is obvious or intuitive,	2 3 4 5 6	Do you ever access a network of individuals that you're familiar with to get information for investigatory research?  A. Sometimes.  Q. And just, without naming any names, describe what that entails?
2 3 4 5 6 7	answer the question.  Q. Excuse me, ma'am, I'm just trying to understand things. And I think maybe you don't understand how a deposition works, but I'm just trying to understand basic information. You might think something is obvious or intuitive, but the record doesn't know that and we don't	2 3 4 5 6 7	Do you ever access a network of individuals that you're familiar with to get information for investigatory research?  A. Sometimes.  Q. And just, without naming any names, describe what that entails?  A. Experience.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	answer the question.  Q. Excuse me, ma'am, I'm just trying to understand things. And I think maybe you don't understand how a deposition works, but I'm just trying to understand basic information. You might think something is obvious or intuitive, but the record doesn't know that and we don't know that. So I please ask you to cooperate.  A. Of course.  Q. So other than looking people up on Facebook, how does Strategic Vision perform investigations?  A. We do investigative background work on individuals that other clients are interested in pursuing information on.  Q. So that background work, does that involve surveillance or electronic research; give me a little detail on what it means to investigate someone for background?  A. Precisely. Just as you said.  Q. Does Strategic Vision do that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Do you ever access a network of individuals that you're familiar with to get information for investigatory research?  A. Sometimes.  Q. And just, without naming any names, describe what that entails?  A. Experience.  Q. Right. Do you speak to individuals in the intelligence community?  A. Yes.  Q. Politicians?  A. Sometimes.  Q. People in the business community?  A. Yes.  Q. And then you take that information and perhaps include that in an investigatory research report, or how does that work?  A. It depends on the client.  Q. Give me an example of a client where you did access that network in order to contribute?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	answer the question.  Q. Excuse me, ma'am, I'm just trying to understand things. And I think maybe you don't understand how a deposition works, but I'm just trying to understand basic information. You might think something is obvious or intuitive, but the record doesn't know that and we don't know that. So I please ask you to cooperate.  A. Of course.  Q. So other than looking people up on Facebook, how does Strategic Vision perform investigations?  A. We do investigative background work on individuals that other clients are interested in pursuing information on.  Q. So that background work, does that involve surveillance or electronic research; give me a little detail on what it means to investigate someone for background?  A. Precisely. Just as you said.  Q. Does Strategic Vision do that investigatory research itself?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Do you ever access a network of individuals that you're familiar with to get information for investigatory research?  A. Sometimes.  Q. And just, without naming any names, describe what that entails?  A. Experience.  Q. Right. Do you speak to individuals in the intelligence community?  A. Yes.  Q. Politicians?  A. Sometimes.  Q. People in the business community?  A. Yes.  Q. And then you take that information and perhaps include that in an investigatory research report, or how does that work?  A. It depends on the client.  Q. Give me an example of a client where you did access that network in order to contribute?  A. I can't do that precisely.
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			02/12/2019
1	Page 22 private, and if they are what the client has	1	Q. And Strategic Vision doesn't have any
2	requested, that's what we do.	2	employees?
3	MR. SCHMIDT: French, maybe you can	3	A. No.
4	give a response to these questions just kind	4	MR. GRENDI: Let's do Exhibit 1 here.
5	of a 30,000-foot level in general of what	5	(Wallop Exhibit 1, Notice of
6	you do would, different ideas you've done	6	Deposition, marked for identification.)
7	over the years, that might be helpful.	7	Q. Ms. Wallop, do you recognize this
8	THE WITNESS: Okay.	8	document?
9	MR. SCHMIDT: Like types of things	9	A. I'm sure it's in the file. I don't
10	you've done to research people, that sort of	10	recognize it particularly.
11	thing.	11	Q. If you turn to the third page there, do
12	Q. Please go ahead.	12	you see that, Attachment A?
13	MR. SCHMIDT: Yeah, go ahead.	13	A. Yes.
14	A. With what?	14	Q. And just generally speaking, do you
15	Q. What he just asked.	15	understand that this is a 30(b)(6) deposition
16	A. Go ahead, ask me the question again.	16	notice?
17	Q. Can you please give an overview of the	17	A. Yes.
18	types of research investigations that Strategic	18	Q. And did you review this document prior
19	Vision does and how they do them?	19	to today?
20	A. We look at individual clients or groups	20	A. Actually, I did not.
21	or companies or areas of interest on behalf of	21	Q. Did you prepare for this deposition in
22	our clients, whether it's international, whether	22	any way?
23	it's domestic.	23	A. Of course.
24	Q. And how many investigations over the	24	Q. You met with your attorneys? And I'll
25	years has Strategic Vision handled?	25	just caution you right away, don't tell me
			D 05
1	Page 23 A. Oh. my goodness. I have no idea.	1	Page 25 anything you said to your attorneys or your
1 2	A. Oh, my goodness, I have no idea.	1 2	anything you said to your attorneys or your
2	A. Oh, my goodness, I have no idea. Q. Ballpark?	2	anything you said to your attorneys or your attorneys said to you.
2 3	A. Oh, my goodness, I have no idea.  Q. Ballpark?  A. I have no idea.		anything you said to your attorneys or your attorneys said to you.  A. Well, exactly, of course I discussed it
2 3 4	<ul><li>A. Oh, my goodness, I have no idea.</li><li>Q. Ballpark?</li><li>A. I have no idea.</li><li>Q. Fifty?</li></ul>	2 3 4	anything you said to your attorneys or your attorneys said to you.  A. Well, exactly, of course I discussed it with my attorneys.
2 3 4 5	<ul><li>A. Oh, my goodness, I have no idea.</li><li>Q. Ballpark?</li><li>A. I have no idea.</li><li>Q. Fifty?</li><li>A. No. I would say probably, maybe 15,</li></ul>	2 3 4 5	anything you said to your attorneys or your attorneys said to you.  A. Well, exactly, of course I discussed it with my attorneys.  Q. And did you meet and go over documents
2 3 4	A. Oh, my goodness, I have no idea.  Q. Ballpark?  A. I have no idea.  Q. Fifty?  A. No. I would say probably, maybe 15,  20, something like that.	2 3 4	anything you said to your attorneys or your attorneys said to you.  A. Well, exactly, of course I discussed it with my attorneys.  Q. And did you meet and go over documents in preparation for this deposition?
2 3 4 5 6 7	A. Oh, my goodness, I have no idea.  Q. Ballpark?  A. I have no idea.  Q. Fifty?  A. No. I would say probably, maybe 15,  20, something like that.  Q. That's since 2005?	2 3 4 5 6 7	anything you said to your attorneys or your attorneys said to you.  A. Well, exactly, of course I discussed it with my attorneys.  Q. And did you meet and go over documents in preparation for this deposition?  MR. SCHMIDT: You can say yes or no.
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2 3 4 5 6 7 8	A. Oh, my goodness, I have no idea.  Q. Ballpark?  A. I have no idea.  Q. Fifty?  A. No. I would say probably, maybe 15,  20, something like that.  Q. That's since 2005?  A. It's probably more than that, but since  2005, yeah.  Q. Okay. And other than investigatory	2 3 4 5 6 7 8	anything you said to your attorneys or your attorneys said to you.  A. Well, exactly, of course I discussed it with my attorneys.  Q. And did you meet and go over documents in preparation for this deposition?  MR. SCHMIDT: You can say yes or no.  A. Yes.  Q. How long did you do that for?  A. Today, or ever, or?
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2 3 4 5 6 7 8 9 10 11	A. Oh, my goodness, I have no idea.  Q. Ballpark?  A. I have no idea.  Q. Fifty?  A. No. I would say probably, maybe 15,  20, something like that.  Q. That's since 2005?  A. It's probably more than that, but since 2005, yeah.  Q. Okay. And other than investigatory services, what kind of services does Strategic Vision provide?	2 3 4 5 6 7 8 9 10 11 12	anything you said to your attorneys or your attorneys said to you.  A. Well, exactly, of course I discussed it with my attorneys.  Q. And did you meet and go over documents in preparation for this deposition?  MR. SCHMIDT: You can say yes or no.  A. Yes.  Q. How long did you do that for?  A. Today, or ever, or?  Q. All in, sure, all together.  A. Sure. I have no idea what the answer
2 3 4 5 6 7 8 9 10 11 12	A. Oh, my goodness, I have no idea.  Q. Ballpark?  A. I have no idea.  Q. Fifty?  A. No. I would say probably, maybe 15,  20, something like that.  Q. That's since 2005?  A. It's probably more than that, but since  2005, yeah.  Q. Okay. And other than investigatory  services, what kind of services does Strategic  Vision provide?  A. As I've said earlier, we work with	2 3 4 5 6 7 8 9 10 11 12 13	anything you said to your attorneys or your attorneys said to you.  A. Well, exactly, of course I discussed it with my attorneys.  Q. And did you meet and go over documents in preparation for this deposition?  MR. SCHMIDT: You can say yes or no.  A. Yes.  Q. How long did you do that for?  A. Today, or ever, or?  Q. All in, sure, all together.  A. Sure. I have no idea what the answer would be.
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	French Wallop	OII	
1	Page 26 A. Yes.	1	Page 28 Dr. Waller or, I'm sorry, Lianchao Han?
2	Q. Did you go over any documents?	2	A. It's public.
3	A. No.	3	O. I understand that.
4	MR. SCHMIDT: I think you should tell	4	A. I have no idea whether they saw it or
5	him that, at the initial meeting we had, we	5	not.
6	went over the	6	
		7	Q. I'm asking whether you personally gave
7	A. Oh, well, of course	'	it to them?
8	MR. SCHMIDT: the documents. That	8	A. I have no idea.
9	counts as well. You should	9	MR. SCHMIDT: Do you remember giving it
10	THE WITNESS: I thought he was talking	10	to them?
11	about the 30 minutes that we met for coffee	11	THE WITNESS: No.
12	before we walked across the street. So,	12	Q. Okay. And it says here, "over a
13	okay.	13	40-year period, the principal has developed and
14	MR. SCHMIDT: Fill out the record.	14	maintained connections with many U.S.
15	THE WITNESS: So, all right. Yeah, no,	15	administrations, Congress, DOD, DOE and other
16	obviously.	16	agencies." Do you see that?
17	Q. Let's clean that up, just so I	17	A. Correct.
18	understand. Did you go over documents in	18	Q. And that's your network of contacts
19	preparation for this deposition?	19	being referred to there?
20	A. Yes.	20	A. Correct.
21	Q. Okay. Let's go to the next document.	21	Q. And if you look a little further down
22	Just generally speaking, you understand that I'll	22	the page, it mentions strategic research, do you
23	be asking questions addressed to Strategic	23	see that?
24	Vision. In response to those, you'll be	24	A. Yes.
25	answering on behalf of Strategic Vision; you	25	Q. Is that investigatory research; I mean,
		_	
	Page 27		Page 29
1	Page 27 understand that, right?	1	Page 29 what does that mean?
1 2	understand that, right?  A. Correct.	2	· ·
2 3	understand that, right?  A. Correct.  MR. GRENDI: This is Exhibit 2.	2 3	what does that mean?  A. It can be.  Q. What about competitive intelligence,
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	French Wallo	p on	02/12/2019
1	Page 3		Page 32
1	A. Correct.	1	A. I think sometime in late October or
2	Q. Does Strategic Vision provide lobbying	2	early November.
3	services?	3	Q. Of what year?
4	A. Again, that depends on the client. We	4	A. 2017.
5	don't do it directly, but we will work with	5	Q. Do you recall if it was Mr. Gertz or
6	people that are lobbyists.	6	Mr. Han that called you, or how did that
7	Q. So sometimes	7	interaction occur?
8	A. Sometimes.	8	A. That's a good question. I think it was
9	Q Strategic Vision provides lobbying	9	Bill Gertz. I think he may have called me.
10	services?	10	Q. And what did he tell you?
11	A. Sometimes, yes.	11	A. He knew that I had been working in the
12	MR. GRENDI: This is 3.	12	past for Taiwan and had been very active in
13	(Wallop Exhibit 3, Document Bates	13	pro-democracy work, and I think he said at that
14	stamped SVUS000077, marked for	14	point he would like to have lunch with me, and,
15	identification.)	15	possibly, Lianchao was at that first lunch. I
16	Q. Ms. Wallop, do you recognize this	16	think that was how it went.
17	document?	17	Q. Those were the three people who were
18	A. I do.	18	present at that lunch?
19	Q. What is it?	19	A. Yes. The three of us, yes.
20	A. It is a preliminary sort of vision for	20	O. And what was discussed there?
21	Miles Guo, for our first meeting, I believe, with	21	A. He discussed Mr. Guo, and that he had
22	him, that both Mike Waller, Dr. Waller and I	22	met with him, I guess, a number of times, I don't
23	worked on.	23	know over what period of time, but that he
24	Q. So the handwriting on the top right	24	believed that he was looking for a group that
25	corner, is that your handwriting?	25	could help change his Mr. Guo Miles Guo's
23	corner, is that your handwriting:	23	could help change his Mr. 600 Miles 600 S
	Page 3		Page 33
1	A. Yes.	1	image in America. He explained a little bit
2	Q. And when did you make that note, if you		about Miles Guo's issues, and we discussed at the
3	recall?	3	time how perhaps there might be a way of helping
4	A. I'd have to to look on my paper	4	him stay in the United States.
5	calendar. I don't remember.	5	Q. What were the issues that you just
6	Q. You have a paper calendar that you	6	mentioned?
7	keep?	7	A. Pro-communist people that were
8	A. No. I'd have to look I'd have to	8	apparently after him. There were many lawsuits
9	look. I remember it was sort of there was	9	apparently that had been filed against Mr. Guo.
10	there was one meeting in early December, and I	10	We didn't know anything about Mr. Guo, per se,
11	don't have that with me.	11	other than some of the media reports.
12	Q. Ms. Wallop, do you keep a calendar?	12	So Lianchao suggested that we meet with
13	A. No, I don't keep anything on I keep	13	him, and I said, well, I will I'll think about
14	notes, sticky notes, so.	14	it and get back to you.
15	Q. You don't keep like a Google	15	Q. And so, you said before that you knew
16	calendar	16	Mr. Gertz from years in politics or what's
17	A. No.	17	your
18	Q or electronic calendar?	18	A. He used to be, he still is, he's still
19	A. God, no.	19	at the Washington Times, and he writes for the
20	Q. You keep paper Post-it notes to track	20	Washington Times, and he's now with the
21	your meetings and schedule?	21	Washington Washington Times.
22	A. Yes.	22	MR. SCHMIDT: Times or Post?
23	Q. How were you introduced to Mr. Guo?	23	THE WITNESS: Washington Times. Good
24	A. Through Bill Gertz and Lianchao Han.	24	God, not the Washington Times.
25	Q. And when did that come about?	25	Q. It's a different it's a different
-	x. The whole dra that come about.	23	z. 10 b a attractate 10 b a attractate

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	French wanop	011	O2/12/2019
1	Page 34 outfit.	1	Page 36 about?
2	A. Yeah. And the it's certainly	2	A. Well, I talked I mentioned to Bill,
3	conservative, it was run under the time when	3	I said, one of the people that I like a lot and
4	Arnaud de Borchgrave was the editor, along with	4	have worked with on a couple of things, but not
5	several other close friends, and he's now at the	5	monetary, but just ideological, was Dr. Waller,
6	Washington Free Beacon, I think, mostly.	6	and I'd like to bring Dr. Waller in on this. And
7	Q. Is that another right of center	7	he said, wow, that would be phenomenal. So, here
8	publication?	8	we are.
9	A. Um-hum. I think I would call it a	9	Q. And did you speak to Mr. Guo before
10	center and conservative. I wouldn't call it	10	putting this document together or was this just
11	right of center.	11	based on your conversations with Mr. Han and
12	Q. I was	12	Mr. Gertz?
13	A. I mean, really?	13	A. I know that we had a preliminary one,
14	Q asking for your I was asking for	14	then we met with Mr. Guo, we did something
15	your understanding of it.	15	similar to this and gave it to him, I believe,
16	A. Well, you've got my understanding of	16	and and then we had, obviously, several other
17	it.	17	meetings after that with Mr. Guo.
18	Q. Thank you.	18	Q. So, just speaking about this first
19	A. You're welcome.	19	meeting. Where did it occur?
20	Q. And how do you know Lianchao Han?	20	A. With Mr. Guo?
21	A. Lianchao and I have crossed paths in	21	Q. Yes.
22	Washington off and on over the years, maybe	22	A. Okay. In his apartment at the
23	because of some of the Taiwan activities in	23	Sherry-Netherland, his penthouse.
24	Washington. But I've always sort of known him	24	Q. And when was that?
25	and liked him. I never worked with him. But	25	A. I don't have a date on here, so I can't
1			
	Page 35		Page 37
1	Page 35 he's an excellent individual.	1	Page 37 tell you.
2	he's an excellent individual.  Q. Did Strategic Vision pay any referral	2	
2 3	he's an excellent individual.  Q. Did Strategic Vision pay any referral fees or any other consideration to Mr. Han for	2 3	tell you.  Q. From your memory.  A. Well, it would have been in December at
2 3 4	he's an excellent individual.  Q. Did Strategic Vision pay any referral fees or any other consideration to Mr. Han for introducing Mr. Guo to you?	2 3 4	tell you.  Q. From your memory.  A. Well, it would have been in December at some point.
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	Trenen wanop		
1	Page 38 this meeting, right?	1	Page 40 been.
2	A. No. But the meeting went on for hours	2	Q. What do you remember about that?
3	and hours and hours. You're asking what was the	3	A. I remember that we discussed that Miles
4	content of the meeting.	4	Guo said that he had a number of people that he
5	Q. Yes.	5	wanted to know more about that were in mainland
6	A. Yes, that's what I'm saying.	6	China, but we didn't have any specifics at that
7	Q. So was this document written during the	7	time what he was talking about.
8	meeting or before?	8	Q. Did Strategic Vision mention that it
9	A. I think this one may have been may	9	could provide that information or that it had
10	have been before, but yes, I think it was	10	that capability?
11	before, because it doesn't mention the real	11	A. I don't recall. It could have.
12	estate and so forth that he got into during the	12	Q. Turning to the last page there, SV79.
13	meeting. So this might have been sort of like	13	It says, "Mr. G should maintain his statesmanlike
14	a it is sort of a vision paper, based on a	14	status by not engaging in everyday defense or
15	conversation with Mr with Bill Gertz and with	15	counterattack, and should leave it up to his own
16	Lianchao Han.	16	surrogates."
17	Q. What do you recall saying about	17	Do you see that?
18	Strategic Vision's capabilities and background?	18	A. Where is that?
19	Actually, let's just start with capabilities.	19	Q. It's the first sentence of the last
20	Do you recall presenting about what	20	paragraph.
21	Strategic Vision could do for Mr. Guo?	21	A. Oh, the regime, yeah. Okay. "Those
22	A. We were talking ideologically mostly	22	surrogates will be in journalism, academia,
23	about what could be done to help present his	23	business, policy." Yes, yes. Okay.
24	views on communist China, on mainland China. And	24	Q. Do you remember talking about that
25	so we didn't get into specifics at the very	25	subject at this meeting?
			<u> </u>
1	Page 39 beginning. We just started sort of having an	1	Page 41 A. Probably.
2	initial conversation about how how we felt he	2	Q. And what do you remember?
4	initial conversacion about now — now we lett ne	4	
3	could be represented in Washington and how we	3	
3 4	could be represented in Washington and how we could show his positive side.	3	A. I don't remember precisely. It's over
4	could show his positive side.	4	A. I don't remember precisely. It's over a year ago.
4 5	could show his positive side. Q. And did you explain what Strategic	4 5	A. I don't remember precisely. It's over a year ago.  Q. And you don't remember what Mr. Guo
4	could show his positive side.	4	A. I don't remember precisely. It's over a year ago.
4 5 6	could show his positive side.  Q. And did you explain what Strategic Vision does or how Strategic Vision could help with that?	4 5 6	A. I don't remember precisely. It's over a year ago.  Q. And you don't remember what Mr. Guo said about that, or anybody else?  A. It was a general, initial conversation
4 5 6 7 8	could show his positive side.  Q. And did you explain what Strategic Vision does or how Strategic Vision could help with that?  A. Probably.	4 5 6 7 8	A. I don't remember precisely. It's over a year ago.  Q. And you don't remember what Mr. Guo said about that, or anybody else?  A. It was a general, initial conversation with somebody that we did not know, and we were
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	Trench wanop	011 (	
1	Page 42 Miles Guo.	1	Page 44 A. He liked it very much.
2	Q. So you remember literally typing and	2	O. Does that include all of the items in
3	creating this document during the meeting?	3	this timeline or was he more receptive to some
4	A. No. Prior to the meeting.	4	services than others?
5	Q. Okay. And when was this second	5	A. It was interesting. He was very keen
6	meeting?	6	on having a a big, a huge, large presence in
7	A. Again, I'd have to ask Mike. I think	7	the way of a residence, and then also purchasing
8	it was I know it was in December of 2017.	8	the American Security and Trust building across
9		9	from the Treasury Department in Washington as an
10	Q. And who was present?  A. Dr. Waller, Mike Waller, myself,	10	office building for him. He liked the idea of
11	Lianchao, and, obviously, Miles Guo.	11	the Washington-based educational and cultural
	· · · · · · · · · · · · · · · · · · ·	12	_
12	~	13	foundation, which we thought might be a good way
	meeting; was he translating?	14	of exposing him to or introducing him to
14	A. Yes, mostly. And explaining, walking		Washington and the Hill, and working on a more
15	through some of the explanations, not only the	15	positive anti-communist role.  O. And in terms of this real estate
16	translation, but, again, we were having a	16	x,
17	generalized conversation.	17	portion of it, acquiring what, a residence?
18	Q. And just for the clarity of the record.	18 19	A. Yes.
19 20	Mr. Han was translating for Mr. Guo?  A. Yes. Both ways.	20	Q. And also an office building, I guess, for a foundation?
21	O. Of course.	21	
22	A. Mr. Guo speaks very good English, so he	22	A. Yes. I just said that. Q. Yes. I understand. And so, is that a
23	doesn't really need an interpreter, but it's	23	service that Strategic Vision typically provides
24	better to have one.	24	for clients?
25	Q. Did Mr. Han actually read this whole	25	A. Yes, sometimes.
2,3	Q. Did Mr. Hall accually read this whole	23	A. 165, Sometimes.
	Page 43		Page 45
1	document to Mr. Guo and translate it for him; was	1	Q. So Strategic Vision will help people
2	that part of the meeting?	2	locate properties and acquire them?
3	A. Yes. I think we walked through each	3	A. Correct.
4	one of these paragraphs, yes.	4	Q. Is that in the D.C. area or nationwide;
5	Q. And going back to the prior document,	5	how does that work?
6	Exhibit 3. Was the same process employed where	6	A. Yes, both. D.C. area, nationwide,
7	Mr. Han, to your understanding, was translating	7	globally, whatever.
8	the document for Mr. Guo?	8	Q. And how was that, let's just call it
9	A. To my understanding, yes.	9	real estate project, followed up on subsequently?
10	Q. But, obviously, you don't speak	10	A. Well, actually, Lianchao I picked up
11	Mandarin, do you?	11	Lianchao and Yvette at a hotel downtown off M
12	A. A little bit. Not as much as I'd like.	12	Street, because she wanted to see all of the
13	Q. Fair enough. But you're not fluent?	13	properties that we had in mind. I think it must
14	A. No.	14	have been obviously honestly I can't remember.
15	Q. Okay. And so, to the extent you	15	I think it was I think it was after this
16	recall, what occurred at this second meeting?	16	second meeting, that she came to Washington, and
17	A. This was a broader timeline based on	17	Lianchao lives in Washington, so we picked him
18	the first meeting and the first vision paper that	18	up, and I had a brochure, a set of brochures of
19	we had in our discussion, and this gave sort of a	19	homes and the office building that we drove
20	menu, so to speak, a la carte, or menu of ideas	20	around, because there are a lot of cameras in
21	as to how we could help Miles Guo, at his	21	Washington.
22	request, to set up sort of a strategic plan for	22	We put her in the back seat with
23	him.	23	Lianchao. I have a Jeep, so those windows happen
24	Q. So what was his response to the	24 25	to have a, whatever it is, sun more blacked out windows than the front two seats.
1 4)	presentation that you made?	رے ا	out willuows than the Hollt two seats.

Page 48 Page 46 1 Q. Tinted windows? \$50 million homes. You have to give a full 2 Α. Tinted, yes. So we drove them around, 2 background. I can say -- I can go in and look at 3 and I pointed out the homes. I never made any it, but when I bring somebody like Yvette, and 3 4 appointments to see the homes, because the last 4 then I'd have to also identify Lianchao; it was thing we wanted to do was sort of bring Yvette or 5 better just to drive around, take a look, decide 6 anybody else in to see the homes. We had the 6 what sort of looked like something that both brochures that had all of the interiors in the 7 7 Lianchao and Yvette thought might fit his 8 homes, photographs, so she could easily see it. 8 persona, and then go back and go and look at the 9 We went around Kalorama, we went around 9 homes, if that's what he wanted to do. 10 Georgetown, we went into what they call Spring 10 Q. Did anything come of that --11 Valley. 11 Α. No. 12 12 -- process? Ο. And, Ms. Wang, was this the first time Ο. 13 you met her? 13 Α. No. And we did make a big foray into 14 Α. No. She was also in one of those 14 trying to get the Riggs Bank building, which is 15 meetings, probably in the first meeting we had, 15 something that he wanted -- I'm sorry, excuse me, this one, sorry; whenever the first meeting was the American Security and Trust building, which 16 16 is what he wanted, opposite the Treasury 17 with Guo, she was present. 17 18 So, I'm sorry, I just want to clarify 18 Department. 0. 19 the record then. Who was present at the first 19 Q. And what was that effort, if you could 20 20 just generally describe that? meeting that you had with Mr. Guo? 21 I think Yvette, Lianchao, Dr. Waller, 21 Well, I called three or four people 22 myself and Miles Guo. 22 that I think were private owners somehow through 23 23 a trust, and they told me repeatedly it wasn't Q. Okay. And when was this --24 Walkabout? 24 for sale. And then I finally found out that of Α. 25 25 Q. Yeah. Little soldiering through the course it was for sale at the right price. Page 47 Page 49 D.C. metro area? 1 Q. Sure. 2 It was sometime in December. It must 2 And we hadn't even gotten down that far have been, you know, somewhere from the --3 down the lane. So I don't know what the number 3 somewhere between the 10th and the 20th of 4 would have been, but it was substantial, hundreds 4 5 December of 2017. 5 of millions. And what did you understand that And you were -- so were those the only, 6 Q. 6 Q. 7 Ms. Wang and Mr. Guo were doing with that trip? 7 we'll call them sellers, you were in contact with 8 What was their purpose in being there? 8 in connection with this real estate project? 9 9 Α. She wanted to see the brochures that we Α. Well, on the office building, yes. 10 had, and I think I -- I can't remember, I think I 10 Q. What about with residential properties? 11 showed the Evermay property to Miles Guo during 11 Well, with Evermay, I was in touch --12 that second meeting. I happen to have a copy of 12 the previous owner of Evermay, sadly, who just 13 13 it with me. I had to ask to get copies of the died in November this year, the previous owner 14 other homes from Washington Fine Properties so 14 had been a childhood friend since I was 12, and they had recently sold, probably five years prior that I knew what he wanted as far as large 15 16 estates or large homes, and he wanted to have a 16 to this, they had recently sold Evermay to a 17 17 presence, he wanted to be close enough to Capitol Japanese couple in the pharmaceutical business. Hill. 18 18 Fast forward, Japanese couple was 19 Ο. And just going back. You didn't show 19 getting divorced. Fast forward as well, the 20 them the interiors of the property because you 20 previous owners of Evermay had a first right of 21 were concerned about surveillance or --21 refusal; should they decide to buy the property 22 Well, the way it works is, if it's in 22 back from the Japanese couple, they could, in 23 23 their contract. Washington particularly, if you take an individual in, you have to identify the 24 So I went to -- his name was Harry

25

Belin. I went to Harry Belin and talked to him

individual into multi-million-dollar, 10, 20, 30,

1	Page 50 about Evermay for Miles Guo, because it would	1	Page 52  A. That was in that December 2017 time,
2	have been a perfect, perfect house for Miles. He	2	yes.
3	could have incorporated his 501(c)(3) in that	3	Q. What was was it research that was
4	house, because it was used as a 501(c)(3)	4	offered or did Mr. Guo ask for that?
5	foundation by both Harry Belin and the Japanese	5	A. I believe he gave us a name, and I
6	pharmaceutical couple.	6	believe that we then had an exploratory peek into
7	Since there was no movement, we didn't	7	what we could find initially.
8	go any further on it, because Miles obviously	8	Q. So what was that exploratory research?
9	didn't I don't know. I don't know what	9	What was done by Strategic Vision?
10	happened.	10	A. It was a it was done by our team, or
11	Q. You kind of anticipated my next	11	the initial team, before we even had a team, that
12	question. When did this kind of process stop or	12	was contracted by us. This was sort of a
13	end?	13	freebie, to take a peek into this individual's
14		14	
	A. Miles was mostly really, really anxious		name, whatever, background. And he gave us the
15	to move on the investigative side of the famous	15	name. I believe it was the number 1 name on the
16	file that you're aware of.	16	folder that you have.
17	Q. Sure.	17	Q. Is that Anita Suen?
18	A. So, on the individuals. I have no	18	A. Yeah.
19	idea he changes his mind all the time, so I	19	Q. And that name was given to someone who
20	have no idea what his change of heart was on	20	has been described by Strategic Vision as the
21	that.	21	leader of Team 1? Was that the
22	Q. When did if you recall, when did the	22	A. What? I'm sorry, I don't understand
23	conversation or negotiations pivot to this	23	that question at all.
24	investigatory research area?	24	Q. Maybe we'll get to it, we can define
25	A. Probably during the second meeting.	25	it. Let's just put it this way. Who was that
	Dog 51		B 50
١	Page 51		Page 53
1	Mike has got a much better memory about these	1	information regarding Anita Suen given to to do
2	Mike has got a much better memory about these things.	2	information regarding Anita Suen given to to do the research?
2 3	Mike has got a much better memory about these things.  Q. Do you recall how that occurred, was it	2 3	information regarding Anita Suen given to to do the research?  A. Mike.
2 3 4	Mike has got a much better memory about these things.  Q. Do you recall how that occurred, was it that Strategic Vision presented its investigatory	2 3 4	information regarding Anita Suen given to to do the research?  A. Mike. Q. Oh, okay. Mike Waller?
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	French Wallop	OII	02/12/2017
1	Page 54 Q. So this freebie research report, was	1	Page 56 It wasn't very in depth. I think it might have
2	that research completed, or conducted?	2	had some numbers on it, it might have had some
3	A. It was conducted. It wasn't completed	3	account numbers on it or something like that.
4	by any stretch.	4	But it was basically just to show how
5	Q. Right. And so what was was anything	5	some things could be retrieved. We had to be
6	presented back to Mr. Guo or Han or Ms. Wang?	6	extremely careful. These things were only
7	A. Yes. I believe, yes, we did show	7	retrieved outside of The United States, and if
8	again, Mr. Han, Mr. Guo, Miles Guo, and Mike and	8	they were they were never retrieved inside The
9	myself were privy to whatever Mike had found.	9	United States.
10	Q. So there was like a third meeting with	10	Q. And why was that?
11	respect to this	11	A. Because it's not really a terribly good
12	A. Yes, somewhere.	12	thing to do.
13	Q pre-report?	13	Q. Is that because it's illegal or
14	A. Yes. In December of 2017.	14	A. It's probably illegal, yes. So we
15	Q. Okay. And where did that take place,	15	would never do anything illegal.
16	was it in New York?	16	MR. SCHMIDT: In The United States.
17	A. Yes.	17	THE WITNESS: In The United States. Or
18	Q. What did Strategic Vision present as	18	elsewhere, actually.
19	this free report or free information?	19	Q. And did this presentation involve
20	A. They I believe they had a Mike	20	showing that there was money in the bank account
21	had a screenshot of a couple of things that he	21	or anything of that nature?
22	showed Miles Guo.	22	A. I don't remember. I saw it so quickly,
23	Q. Was it information about accessing a	23	I because it was really Guo and either Yvette
24	CITIC Bank account?	24	or Lianchao looking at it. I wasn't looking at
25	A. I believe so, yes. It wasn't	25	it.
	Page 55		Page 57
1	Page 55 accessing. Please understand, there's a huge	1	Page 57 Q. Had you looked at these screenshots or
1 2		1 2	<u> </u>
	accessing. Please understand, there's a huge		Q. Had you looked at these screenshots or
2	accessing. Please understand, there's a huge difference.	2	Q. Had you looked at these screenshots or information prior to the meeting?
2 3	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain.	2 3	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did.
2 3 4	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain. What was presented? That's what I want to	2 3 4	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did.  Q. Okay.
2 3 4 5	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain.  What was presented? That's what I want to understand.	2 3 4 5	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did.  Q. Okay.  A. Because, again, we compartmentalize
2 3 4 5 6	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain.  What was presented? That's what I want to understand.  A. Yes. There's a huge difference between	2 3 4 5 6	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did. Q. Okay.  A. Because, again, we compartmentalize stuff.
2 3 4 5 6 7	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain.  What was presented? That's what I want to understand.  A. Yes. There's a huge difference between accessing. It was what	2 3 4 5 6 7	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did. Q. Okay.  A. Because, again, we compartmentalize stuff. Q. So that was Dr. Waller's aspect of this
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2 3 4 5 6 7 8 9 10 11 12	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain.  What was presented? That's what I want to understand.  A. Yes. There's a huge difference between accessing. It was not accessing. It was what they call peeking. It was not invading into the server.  Q. Okay.  A. Okay.  Q. What does peeking mean? I just want to	2 3 4 5 6 7 8 9 10 11 12	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did. Q. Okay.  A. Because, again, we compartmentalize stuff. Q. So that was Dr. Waller's aspect of this presentation, he handled that?  A. I agree. Q. Did you tell Eastern or the people present that you had enough information about this person, Ms. Suen, to prove that she had
2 3 4 5 6 7 8 9 10 11 12	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain.  What was presented? That's what I want to understand.  A. Yes. There's a huge difference between accessing. It was not accessing. It was what they call peeking. It was not invading into the server.  Q. Okay.  A. Okay.  Q. What does peeking mean? I just want to understand that clearly.	2 3 4 5 6 7 8 9 10 11 12 13	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did. Q. Okay.  A. Because, again, we compartmentalize stuff.  Q. So that was Dr. Waller's aspect of this presentation, he handled that?  A. I agree. Q. Did you tell Eastern or the people present that you had enough information about this person, Ms. Suen, to prove that she had committed crimes?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain. What was presented? That's what I want to understand.  A. Yes. There's a huge difference between accessing. It was not accessing. It was what they call peeking. It was not invading into the server.  Q. Okay.  A. Okay.  Q. What does peeking mean? I just want to understand that clearly.  A. To look over the wall.  THE WITNESS: As I see, Yvette has walked into the room.  MR. SCHMIDT: The court reporter will take down the appearance. That's fine.  (Ms. Yvette Wang has joined the deposition.)  THE WITNESS: So, Yvette Wang has just	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did. Q. Okay.  A. Because, again, we compartmentalize stuff. Q. So that was Dr. Waller's aspect of this presentation, he handled that?  A. I agree. Q. Did you tell Eastern or the people present that you had enough information about this person, Ms. Suen, to prove that she had committed crimes?  A. First of all, we had no idea who Eastern was, so I don't know what you mean about Eastern. Q. I'm obviously talking about Eastern Profit. Let's just put it this way  A. Yeah, but we're not here about Eastern Profit, as you understand. I never heard of Eastern Profit until there was a contract.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain. What was presented? That's what I want to understand.  A. Yes. There's a huge difference between accessing. It was not accessing. It was what they call peeking. It was not invading into the server.  Q. Okay.  A. Okay.  Q. What does peeking mean? I just want to understand that clearly.  A. To look over the wall.  THE WITNESS: As I see, Yvette has walked into the room.  MR. SCHMIDT: The court reporter will take down the appearance. That's fine.  (Ms. Yvette Wang has joined the deposition.)  THE WITNESS: So, Yvette Wang has just walked into the room.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did. Q. Okay. A. Because, again, we compartmentalize stuff. Q. So that was Dr. Waller's aspect of this presentation, he handled that? A. I agree. Q. Did you tell Eastern or the people present that you had enough information about this person, Ms. Suen, to prove that she had committed crimes?  A. First of all, we had no idea who Eastern was, so I don't know what you mean about Eastern. Q. I'm obviously talking about Eastern Profit. Let's just put it this way A. Yeah, but we're not here about Eastern Profit, as you understand. I never heard of Eastern Profit until there was a contract. Q. Right. Did you ever tell the people
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain. What was presented? That's what I want to understand.  A. Yes. There's a huge difference between accessing. It was not accessing. It was what they call peeking. It was not invading into the server.  Q. Okay.  A. Okay.  Q. What does peeking mean? I just want to understand that clearly.  A. To look over the wall.  THE WITNESS: As I see, Yvette has walked into the room.  MR. SCHMIDT: The court reporter will take down the appearance. That's fine.  (Ms. Yvette Wang has joined the deposition.)  THE WITNESS: So, Yvette Wang has just walked into the room.  A. So, the peeking was a screenshot, I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did. Q. Okay.  A. Because, again, we compartmentalize stuff. Q. So that was Dr. Waller's aspect of this presentation, he handled that?  A. I agree. Q. Did you tell Eastern or the people present that you had enough information about this person, Ms. Suen, to prove that she had committed crimes?  A. First of all, we had no idea who Eastern was, so I don't know what you mean about Eastern. Q. I'm obviously talking about Eastern Profit. Let's just put it this way  A. Yeah, but we're not here about Eastern Profit, as you understand. I never heard of Eastern Profit until there was a contract. Q. Right. Did you ever tell the people present at this meeting that you had enough
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	accessing. Please understand, there's a huge difference.  Q. Oh, please. I want you to explain. What was presented? That's what I want to understand.  A. Yes. There's a huge difference between accessing. It was not accessing. It was what they call peeking. It was not invading into the server.  Q. Okay.  A. Okay.  Q. What does peeking mean? I just want to understand that clearly.  A. To look over the wall.  THE WITNESS: As I see, Yvette has walked into the room.  MR. SCHMIDT: The court reporter will take down the appearance. That's fine.  (Ms. Yvette Wang has joined the deposition.)  THE WITNESS: So, Yvette Wang has just walked into the room.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Had you looked at these screenshots or information prior to the meeting?  A. No, I don't believe I did. Q. Okay. A. Because, again, we compartmentalize stuff. Q. So that was Dr. Waller's aspect of this presentation, he handled that? A. I agree. Q. Did you tell Eastern or the people present that you had enough information about this person, Ms. Suen, to prove that she had committed crimes?  A. First of all, we had no idea who Eastern was, so I don't know what you mean about Eastern. Q. I'm obviously talking about Eastern Profit. Let's just put it this way A. Yeah, but we're not here about Eastern Profit, as you understand. I never heard of Eastern Profit until there was a contract. Q. Right. Did you ever tell the people

Page 69		French wanop	-	
2 comments to that, 3 Q. Do you recall Mr. Waller talking about 4 crimes or anything like that at this meeting? 5 A. I wouldn't call them crimes. I think 6 they were asking for investigative background. 7 Miles Guo wanted to have as much information 8 on investigative background on a couple of 9 people, and I think she was the first ond only 10 person he actually gave me gave us the name 1 about earlier, as a acut of trial. 12 Q. And you understood that Strategic 13 Vision wouldn't be compensated for this 14 A. No. 15 Q project? 16 A. Not well, we 17 Q. And what I mean by project is this 18 little presentation? 19 A. No It was just to show then what we 19 had a certain capacity of boing able to do. It 19 was a limited capacity of boing able to do. It 20 y. Do you understand why the information 21 was requested, what the goal was? 22 A. The goal was probably to nort of maybe 23 test some of the work that we could do  1 comparison to the work that we could do  1 comparison to the work that we could do  2 very time to understand that the research was going to be used for one way or another? 2 very an alimited capacity of boing able to do. It 2 was a limited capacity of boing able to do. It 3 was requested, what the goal was? 4 A. The goal was probably to nort of maybe 2 test some of the work that we could do  1 comparison the work that we could do  2 people, and you understand why the information 2 was requested, what the goal was? 4 A. The goal was probably to nort of maybe 2 test some of the work that we could do  2 people, and what I mean by project is this 3 investigatory research; 5 A. We care very pro-democracy. 5 A. We never the work that we could do  4 the research project as a whole was, what the 5 requesters of the information were trying to do? 6 A. For the entire project? 7 O. Yes. Why did they wun this 8 investigatory research; 9 A. We lift have been done to the work that was going to do with it. Neybe he was 19 comparison to do with the was 20 put think that it was involved with th	1		1	e
Q. Do you recall Mr. Naller talking about crimes or anything like that at this meeting? A. I wouldn't coll them crimes. I think they were asking for investigative background on a couple of people, and I think she was the first and only person he actually gave ne - gave us the name li about earlier, as a sort of trial. Q. And you understood that Strategic li Vision wouldn't be corepressed for this - A. No well, we - Q. on project? A. No well, we - Q. and wouldn't be corepressed for this - I was a similar capacity of being able to do. It was a similar capacity at that time.  Do you understand why the information was requested, what the goal was? A. The goal was probably to soot of maybe test some of the work that we could do  Page 59 C. Do you understand what the end goal of the necesoring project as a whole was, what the research project as a whole was, what the requesters of the information was requested, what the was probably to soot of maybe test some of the work that we could do  Page 59 C. De try understand what the end goal of the no. Did you understand what the end goal of the no. Did you understand what the end goal of the requesters of the information were trying to do? A. For the entire project? C. D. Yes. Why did they wan this investigatory research? A. Well, that's a really good question. C. A. No. SCHULD' If you know or you don't. A. I don't know. C. O. Kay, You never discussed what the research would be used for or anything like that twith Mr. Guo or Ms. Nang or Mr. Han? A. No. C. O. May, You never discussed what the research would be used for or anything like that the political conversations was organized preserved. A. No. C. O. May, You never discussed what the research would be used for or anything like that the political conversations was used and the was going to do with it. We certainly were not going to do with it. We were not sure confidentiality agreements, but he was a whole was, what the research project? A. Bell, you know precisely what I'm approach the was going to do with it. We				
derimes or anything like that at this meeting?  A. I wouldn't call them crimes. I think they were asking for investigative background. Miles do wanted to have as much information on — investigative background on a couple of people, and I think she was the first and only person he actually gave me — gave us the name about earlier, as a sort of trial.  Q. And you understood that Strategic live have no idea what twette did with it. We have no idea what Yvette did with it. We have no idea what two did with it. We have no idea what bappened to it. Q. So Strategic Vision didn't care what the research was gaing to be used for one way or another?  A. No. — well, we — O. And what I mean by project is this little presentation? A. No. It was just to show then what we had a certain capacity of being able to do. It was a limited capacity at that time. O. Do you understand shy the information was requested, what the goal was? A. The goal was probably to sort of maybe test some of the work that we could do  Page 59  compartmentally.  C. Let me just be a little more specific then. Did you understand what the end goal of the research project as a whole was, what the requesters of the information were trying to do? A. For the entire project? O. Yea, May did they want this investigatory research? A. Well, I just gave you my opinion.  Page 50  A. We have no idea what hapened to it.  Q. I see.  A. We cared very much what it was going to be used for one way or another?  A. We cared very much what it was going to do with it. We have no idea what hapened to it.  Q. I see.  A. We cared very much what it was going to do with it.  You have no idea what happened to it.  Q. I see.  A. We cared very much what it was going to much what it was going to be used for: We are very admently pro-democracy.  So hid you understand that the research was let the well of lift against the communist  and I are adamently pro-democracy.  So did you understand what the well you have was did the well to fish against the communist  party in China?  A. Well, I				
they were asking for investigative background.  they were asking for investigative background.  they were asking whether or not you knew why  they were asking whether or not you knew why  they research was requested. That's what I'm  they not deal what they old with it. We  there no idea what too did with it. We  there research was going to be used for one way or  another?  2				
6 they were asking for investigative background. 7 Miles Guo wanted to have as much information 8 on — investigative background on a couple of 9 people, and I think she was the first and only 10 person he actually gave me — gave us the name 11 about earlier, as a sort of trial. 12 Q. And you understood that Strategic 14 A. No. 15 Q. — project? 16 A. No. — well, we — 17 Q. And what I mean by project is this 18 little presentation? 18 little presentation? 19 A. No. It was just to show them what we 10 had a certain capacity of being able to do. It 12 was a limited capacity at that time. 13 vas requested, what the goal was 10 A. No. 11 was a limited capacity of being able to do. It 12 vas a limited capacity of being able to do. It 13 the research was going to be used for one way or 14 another? 15 A. No. 16 D. by our understand why the information 17 vas requested, what the goal was 18 vas requested with that time. 19 A. No. It was fust to show them what we 20 bad a certain capacity of being able to do. It 21 vas a limited capacity of being able to do. It 22 C. Do you understand what the end goal of 23 then. Did you understand what the end goal of 24 the research project as a whole was, what the 25 reguesters of the information were trying to do? 26 A. For the entire project? 27 Q. Yes. Why did they want this 28 investigatory research? 29 A. No. 20 C. That's why I'm asking. Do you know? 21 R. SCHIDT: If you know or you don't. 21 A. I don't know. 22 part of the communist party, and her parents were 23 part of the communist party, and her parents were 24 part of the communist party, and her parents were 25 part of the communist party, and her parents were 26 part of the communist party, and her parents were 27 part of the communist party, and her parents were 28 part of the communist party, and her parents were 29 part of the communist party, and her parents were 29 part of the communist party, and her parents were 20 part of the communist party, and her parents were 21 part of the communist party, and her parents wer				**
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	French Wallop	OII V	02/12/2017
1	Page 62 Q. I really don't. I'm just trying to	1	Page 64 that?
2	be	2	A. Yes.
3	THE WITNESS: I know, he knows what I'm	3	Q. Can you describe what this capability
4	referring to.	4	is? It says it was originally developed by the
5	Q. I actually don't, so you'll have to	5	U.S. military.
6	forgive me. And so, what was the response to	6	A. Yes, this is one of the things that
7	this presentation of the CITIC, as you what	7	Mike was aware of.
8	did you describe it as, the peering over the	8	Q. Are you aware of it, or you don't know
9	wall?	9	about this service?
10	A. I'm sorry?	10	A. I'm aware of it, but he's more
11	Q. What was the response of Mr. Han or	11	experienced with it.
12	Ms. Wang or Mr. Guo to your presentation?	12	Q. Well, let's what do you know about
13	A. I suppose they were interested. I	13	it?
14	wasn't I wasn't that surprised that something	14	A. Exactly what it says. I mean, I'm
15	couldn't be brought up off the internet from some	15	aware of it. I don't know any more than than
16	of the investigators that Mike would have known	16	that. Mike is the one who is fully aware of it.
17	about.	17	Q. I appreciate that Mr. Waller might know
18	Q. So, in other words, you understood that	18	more about it than you, but I'm asking what you
19	this was what Mike's team or contacts could	19	know.
20	provide?	20	A. I'm aware of what this paragraph says.
21	A. Yes.	21	Q. You don't know anything else about this
22	Q. Did you feel that the recipients of	22	capability or what it is?
23	this information were impressed by it?	23	A. I'm aware of the social media and text
24	A. I have no idea.	24	messaging communications in multiple languages.
25	Q. They didn't say anything like, wow,	25	Q. Okay. But you don't provide this
	Daga 62		Dogo 65
1	Page 63 this is great or	1	Page 65 service, this isn't something that Strategic
1 2	· · · · · · · · · · · · · · · · · · ·	1 2	
	this is great or		service, this isn't something that Strategic
2	this is great or A. I have no idea.	2	service, this isn't something that Strategic Vision does itself?
2 3	this is great or  A. I have no idea.  Q. You mean you don't remember or you just	2 3	service, this isn't something that Strategic Vision does itself?  A. Only through our teams do we do this.
2 3 4	this is great or  A. I have no idea.  Q. You mean you don't remember or you just don't	2 3 4	Service, this isn't something that Strategic Vision does itself?  A. Only through our teams do we do this.  Q. Okay. Is this service part of
2 3 4 5	this is great or  A. I have no idea.  Q. You mean you don't remember or you just don't  A. I have no idea.	2 3 4 5	service, this isn't something that Strategic Vision does itself?  A. Only through our teams do we do this.  Q. Okay. Is this service part of investigatory research or is it separate?
2 3 4 5 6	this is great or  A. I have no idea.  Q. You mean you don't remember or you just don't  A. I have no idea.  Q. So you know the information was	2 3 4 5 6	Service, this isn't something that Strategic  Vision does itself?  A. Only through our teams do we do this.  Q. Okay. Is this service part of investigatory research or is it separate?  A. It would probably be part of the full
2 3 4 5 6 7	this is great or  A. I have no idea.  Q. You mean you don't remember or you just don't  A. I have no idea.  Q. So you know the information was presented, but you don't recall how it was	2 3 4 5 6 7	Service, this isn't something that Strategic  Vision does itself?  A. Only through our teams do we do this.  Q. Okay. Is this service part of investigatory research or is it separate?  A. It would probably be part of the full package. We were not sure what Miles Guo wanted,
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	French wanop	011	02/12/2017
1	Page 70 about the fraud beyond	1	Page 72 Q. And which family is that?
2	THE WITNESS: Yes.	2	<ul><li>Q. And which family is that?</li><li>A. The Al Nahyan family.</li></ul>
3	MR. SCHMIDT: what you read in the	3	
4	media?	4	Q. Is that on this list? I'm sorry, I have trouble reading your handwriting.
5	THE WITNESS: Yes.	5	A. Yes, it is.
6	Q. Okay. And that's from who; how did you	6	Q. That's the one, two, three, four
7	hear about that?	7	fifth one from the top?
8	You can look at me. I'm asking you the	8	A. Yes.
9	questions.	9	Q. And what did they say to you about
10	A. Privileged privileged sources.	10	that?
11	Q. Okay. So you're refusing to answer	11	A. When I mentioned his name, they said
12	that question based on privilege?	12	that, yes, they were fully aware of him and that
13	A. Yes.	13	it was not a pleasant experience.
14	Q. And what privilege is that?	14	Q. Why were you talking to the Al Nahyan
15	MR. SCHMIDT: Do you want to go talk	15	family about Mr. Guo?
16	about it?	16	A. Because Mr. Guo, I believe, had been
17	THE WITNESS: Yes.	17	telling me with this document that he knew all of
18	MR. SCHMIDT: Why don't we go off the	18	these people, and I was checking on whether he
19	record and see what's going on.	19	did know any of these people. And so it came up
20	MR. GRENDI: I'll tell you what, why	20	that he defrauded the UAE and the family of over
21	don't we just put a pin in it, and keep	21	\$3 billion, as you well know.
22	going.	22	Q. And you didn't agree to keep your
23	MR. SCHMIDT: That's fine, too. Okay,	23	relationship with Mr. Guo confidential when you
24	we can do it at a break.	24	were speaking with him?
25	MS. TESKE: Let's take a break for a	25	A. That had nothing to do with
23	rib. Hibrar Lee b care a break for a	25	A. Hite had heling to do with
1	Page 71	1	
1	quick second.	1	confidentiality. He was the one that gave me
2	quick second.  THE VIDEOGRAPHER: Off the record at	2	confidentiality. He was the one that gave me he asked me for these references. I wanted to
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	Trench wanop	011	
1	Page 74 Q. It's called "Time to Get Them."	1	Page 76 presented?
2	Do you know how that title was reached,	2	A. Well, it would have been one of the
3	created?	3	four I mean all four of us. It would have
4	A. Yes, yes.	4	been Lianchao, Guo, myself and Mike.
5	Q. How's that?	5	Q. Okay. Do you remember where that
6	A. It came as a result of conversations	6	A. And possibly Yvette.
7	with Guo, Lianchao and Mike and myself regarding	7	Q. Okay.
8	the regarding the communists working within	8	A. I don't remember.
9	The United States, from China DRC, as well as	9	Q. And do you remember where that was?
10	elsewhere.	10	A. In his flat, in his apartment at the
11	Q. So in the chronology of meetings we've	11	Sherry-Netherlands.
12	been talking about, was this document created	12	Q. Okay.
13	before the first meeting, the second meeting, the	13	A. All meetings were there with him.
14	third meeting? When did it	14	Q. That's helpful. So you never met with
15	A. Oh, it had to have been after the	15	Mr. Guo in Washington, D.C.?
16	second or third meeting, because there's this	16	A. No.
17	photograph of Anita here.	17	Q. Okay. Let's look at 387. It says,
18	Q. And that's on SVUS387? If you look at	18	"build and operate a secret system for
19	the bottom right-hand corner	19	micro-targeted intelligence collection and
20	A. Correct.	20	analysis." Do you see that?
21	Q that's where those	21	A. Yes.
22	A. Or maybe that's Yvette. I'm not sure.	22	Q. Is that a service that Strategic Vision
23	No, I think it is Anita.	23	would provide or someone else?
24	Q. Okay. Was this a PowerPoint	24	A. Through Mike and his teams, and some of
25	presentation?	25	my people, yes.
			2 2 3 2 3 2 3 3 3 3 3 3 3 3 3 3 3 3 3 3
1	Page 75 A. Yes.	1	Page 77 Q. What do you mean by your people?
2	Q. And was it presented as a PowerPoint on	2	A. Some of my channels, as we discussed
3	a computer or did you print it out? How was	3	earlier.
4	it	4	Q. I see. So in terms of this service,
5	A. It might have been on a USB key.	5	the game plan was for Dr. Waller to do most of
6	Q. And did you participate in creating	6	the research, is that fair to say, through his
7	this document or did Mr Dr. Waller create it	7	channels?
8	himself?	8	A. I would say it was equal.
9	A. Dr. Waller did much of it. I worked	9	Q. Okay.
10	with him on some of it; not all of it, but some	10	A. It depends. I mean, it depended on
11	of it.	11	which target we were working with.
12	Q. So you made edits or	12	Q. So I have some understanding of what
13	A. Yes.	13	Dr. Waller's process and capabilities were from
14	Q. And when was this presented to well,	14	his deposition. I want to know what what it
15	let's start with striking that.	15	is that you personally would provide as a service
16	Who was this presented to?	16	in connection with micro-targeted intelligence,
17		17	collection and analysis?
18		18	A. It depended on which target and which
19	Guo. Q. Anyone else?	19	channels we both used collectively to bring the
20		20	information together on individuals or documents.
21	myself. I can't remember if Yvette was in there	21	Q. Right. And I'm trying to understand
22	or not. He often didn't want her in the room,	22	what
23	so, who knows.	23	A. I don't
24	Q. I understand. But you don't recall	24	Q process
25	specifically who was in the room when this was	25	A. I can't answer that.

	French Wallop	on	02/12/2019
1	Page 78 Q. Well, I didn't even ask a question. So	1	Page 80 you did, Strategic Vision, to collect
2	I want you to just wait for me to ask, and then	2	information?
3	you can answer.	3	MR. SCHMIDT: Objection. She's talked
4	A. Go ahead.	4	about going out and getting Mike Waller and
5	Q. Yes, thank you. So I want to	5	putting that together
6	understand what part of the process you would	6	MR. GRENDI: I'm asking about anything
7	participate in. What would you do to help in the	7	else.
8	collection process or accessing of the channels	8	MR. SCHMIDT: Okay, anything else.
9	process?	9	A. Collecting teams. Collecting teams.
10	A. Collection and gathering. It was like	10	Q. Let's do it this way. Setting aside
11	hunting and gathering. We both did it.	11	what Mr. Waller and his teams did. Was there any
12	Q. And what would you do in connection	12	other teams accessed to provide information in
13	with this engagement? What was it that you would	13	connection with this investigatory research?
14	do?	14	A. Yes.
15	A. We would collect	15	Q. And who were they?
16	Q. You.	16	A. There were some from the U.K., there
17	A through my channels.	17	were some from Israel, there were some from the
18	Q. Right.	18	Middle East, there were some from our networks.
19	A. Him through his channels.	19	Q. And now I'm talking about you
20	Q. And what channels did you access in	20	personally.
21	connection with this engagement?	21	A. Yes.
22	MR. SCHMIDT: Just to objection for	22	Q. Are these people that you personally
23	a second here. This is a 30(b)(6).	23	contacted?
24	THE WITNESS: I don't understand the	24	A. Yes.
25	question.	25	Q. Okay. That's all I'm trying to
1	Page 79  MR. SCHMIDT: So you're saying you as	1	Page 81 understand. Without naming any names, would that
2	Strategic Vision, or are you saying you	2	involve calling people on the phone or emailing
3	French Wallop? How do you want to do it?	3	them?
4	MR. GRENDI: Let's do Strategic Vision.	4	A. Rarely. It's face-to-face.
5	MR. SCHMIDT: Yeah. I mean, that's	5	MR. SCHMIDT: Just listen to the
6	really the question here.	6	question. Don't be distracted by the
7	MR. GRENDI: That's fine.	7	document for now.
8	THE WITNESS: Okay.	8	Q. And so, in connection with the research
9	Q. What did Strategic Vision do in terms	9	in this matter, how many face-to-face meetings
10	of collection and analysis?	10	did you have with people in your contacts? I'm
11	A. That's what we did, we did collection	11	talking about you, Ms. Wallop.
12	and analysis.	12	MR. SCHMIDT: Objection.
13	Q. So there's no more specificity	13	A. I have no idea. Many.
14	A. Through our own sources.	14	Q. You said you rarely do telephone calls.
15	Q to it than that? What does that	15	Did you do some in connection with this research
16	mean?	16	agreement?
17	A. How do you put a legal case together?	17	A. No.
18	You have to start with bits and pieces. So	18	Q. What about internet research, did you
19	that's what we were doing. We were each	19	do any internet research in connection with this?
20	collecting bits and pieces to make the cases.	20	MR. SCHMIDT: Objection. Her
21	Q. Let me ask it this way. Did you ask	21	personally?
22	people in your network, do you know who Anita	22	Q. Strategic Vision. Did Strategic Vision
23	Suen is? What do you know about her?	23	do any internet research in connection with this
24	A. No.	24	research?
25	Q. So I'm trying to understand what it is	25	A. Lightly. That was not our that was
1			<u> </u>

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	French wallop		
1	Page 82 not our way of doing it.	1	Page 84  A. When Guo threw that whole document down
2	Q. And what about you personally?	2	on the coffee table in his apartment and he said,
3	A. No.	3	these are the people I want investigated, these
4	Q. It says in this document that the first	4	are I said, where did this list come from?
5	ten targets are identified, do you see that?	5	And he said, I paid \$250 million for this list.
6	A. What page?	6	I said, wow, okay. So that's when I knew who the
7	Q. 387.	7	first ten targets were.
8	A. Yes.	8	MR. GRENDI: Let's do Exhibit 7.
9	Q. What did you understand that to mean?	9	(Wallop Exhibit 7, Document entitled
10	A. Well, Guo gave us Miles Guo gave us	10	"1: Anita Yiu Suen", marked for
11	a large packet of names, and, in that in the	11	identification.)
12	first ten, which they upped it to 15 in the first	12	Q. Do you recognize what's been marked as
13	month, but the first ten targets were identified,	13	Wallop 7?
14	and then they changed their mind and asked for 15	14	A. Correct, I do.
15	for the first month. So that's those were his	15	Q. And is this the document that you just
16	targets.	16	said Mr. Guo threw down on the table?
17	Q. So these ten targets, are those	17	A. It looks like it.
18	referred to as fish in the signed research	18	Q. Okay. So, to your recollection,
19	agreement?	19	Mr. Guo threw a paper copy of this document onto
20	A. Correct.	20	a table at some point during a meeting?
21	Q. And it says, "monitor the ten targets	21	A. No, on onto his coffee table in his
22	for several months to understand their habits,	22	sun room, yes.
23	patterns, personal and professional networks,	23	Q. When was that?
24	businesses and corruption." Do you see that?	24	A. During the probably the second or
25	A. Correct.	25	third meeting we had with him in New York, in
1	Page 83 O. Who would do that work of monitoring?	1	Page 85 December of 2017.
	Q. Who would do that work of monitoring?	1 2	December of 2017.
1 2 3	<ul><li>Q. Who would do that work of monitoring?</li><li>A. Our team.</li></ul>	1 2 3	· ·
2	<ul><li>Q. Who would do that work of monitoring?</li><li>A. Our team.</li><li>Q. And by our team, what encompasses the</li></ul>	2	December of 2017.  Q. So did you keep that paper copy that
2 3	<ul><li>Q. Who would do that work of monitoring?</li><li>A. Our team.</li></ul>	2 3	December of 2017.  Q. So did you keep that paper copy that was thrown on the table?  A. Well, I had this copy, I mean, the copy
2 3 4	Q. Who would do that work of monitoring? A. Our team. Q. And by our team, what encompasses the Strategic Vision team for this research	2 3 4	December of 2017.  Q. So did you keep that paper copy that was thrown on the table?
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2 3 4 5 6	Q. Who would do that work of monitoring?  A. Our team.  Q. And by our team, what encompasses the Strategic Vision team for this research agreement?  MR. SCHMIDT: Objection. Go ahead.  A. The particular team, we called it Team	2 3 4 5 6	December of 2017.  Q. So did you keep that paper copy that was thrown on the table?  A. Well, I had this copy, I mean, the copy of the copy. I mean, the original that he gave us.
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		OII	02/12/2019
1	Page 86	1	Page 88 A. I don't remember. I don't know
	us.		
2	Q. I see.	2	precisely.
3	A. He threw his copy down on the table.  O. And this was at the second or third	3	Q. Okay. And you don't remember
4	**	4	discussing whether what the political weapon
5	meeting?	5	would be?
6	A. Yeah.	6	A. Well, a political weapon, which is what
7	Q. Okay.	7	Guo wanted to use towards his investigation of
8	A. Yes.	8	these individuals. He was going to use it
9	Q. And you did not retain a copy from that	9	against them, for whatever purpose.
10	meeting?	10	Q. But you don't know the purpose?
11	A. No.	11	A. Not entirely.
12	Q. And did you go through the paper copy	12	Q. Okay. A couple of bullets down it
13	that was on the table?	13	says, "Break the Party's control of corrupt
14	A. With him?	14	information" or "corruption information" I
15	Q. Yes. Or on your own.	15	should say. Do you see that?
16	A. Well, we glanced at it. Mike was	16	A. Yes.
17	there. We glanced at it to try to get an idea as	17	Q. What is "the Party's control"? Which
18	to who it was, what it was.	18	party are we talking about there?
19	Q. We'll come back to this. Going back to	19	A. Talking about the communist party.
20	Exhibit 6. On 387, it says, "Document everything	20	Q. And what control of corruption
21	as leverage to gain concessions, protect people,	21	information does the communist party have?
22	use as political weapon, or as aid in criminal	22	A. Well, Guo had said that the CCP, or the
23	prosecution and asset recovery."	23	communist party of China, there was a great deal
24	Do you see that, it's the fourth or	24	of corruption within the leadership, and, as a
25	fifth bullet down?	25	result of that, he wanted to find as much
	D 05		D 00
1	Page 87 A. I don't have it.	1	Page 89 corruption as possible, and he wanted us to
1 2	A. I don't have it.	1 2	corruption as possible, and he wanted us to
2	A. I don't have it. Q. Oh, I'm sorry.	2	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption.
2 3	A. I don't have it. Q. Oh, I'm sorry. A. So, what page?	2 3	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption.  In other words, funds that would have been taken
2 3 4	A. I don't have it.  Q. Oh, I'm sorry.  A. So, what page?  Q. The same one we've been looking at,	2 3 4	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all
2 3 4 5	A. I don't have it. Q. Oh, I'm sorry. A. So, what page? Q. The same one we've been looking at, 387.	2 3 4 5	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all of these things that were part of that.
2 3 4 5 6	A. I don't have it. Q. Oh, I'm sorry. A. So, what page? Q. The same one we've been looking at, 387. A. So what would you like to look at?	2 3 4 5 6	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all of these things that were part of that.  Q. I understand. And so going to the next
2 3 4 5 6 7	A. I don't have it. Q. Oh, I'm sorry. A. So, what page? Q. The same one we've been looking at, 387. A. So what would you like to look at? Q. Where it says, "Document everything as	2 3 4 5 6	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all of these things that were part of that.  Q. I understand. And so going to the next page, 388. It says, "Reduce political threats to
2 3 4 5 6 7 8	A. I don't have it. Q. Oh, I'm sorry. A. So, what page? Q. The same one we've been looking at, 387. A. So what would you like to look at? Q. Where it says, "Document everything as leverage to gain concessions, protect people, use	2 3 4 5 6 7 8	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all of these things that were part of that.  Q. I understand. And so going to the next page, 388. It says, "Reduce political threats to yourself and your cause."
2 3 4 5 6 7 8	A. I don't have it. Q. Oh, I'm sorry. A. So, what page? Q. The same one we've been looking at, 387. A. So what would you like to look at? Q. Where it says, "Document everything as leverage to gain concessions, protect people, use as political weapon, or as aid in criminal	2 3 4 5 6 7 8 9	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all of these things that were part of that.  Q. I understand. And so going to the next page, 388. It says, "Reduce political threats to yourself and your cause."  What did you understand is the
2 3 4 5 6 7 8 9	A. I don't have it. Q. Oh, I'm sorry. A. So, what page? Q. The same one we've been looking at, 387. A. So what would you like to look at? Q. Where it says, "Document everything as leverage to gain concessions, protect people, use as political weapon, or as aid in criminal prosecution and asset recovery"?	2 3 4 5 6 7 8 9	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all of these things that were part of that.  Q. I understand. And so going to the next page, 388. It says, "Reduce political threats to yourself and your cause."  What did you understand is the political threats to whoever yourself or your
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2 3 4 5 6 7 8 9 10 11	A. I don't have it.  Q. Oh, I'm sorry.  A. So, what page?  Q. The same one we've been looking at,  387.  A. So what would you like to look at?  Q. Where it says, "Document everything as leverage to gain concessions, protect people, use as political weapon, or as aid in criminal prosecution and asset recovery"?  A. Correct.  Q. What is the what was that about;	2 3 4 5 6 7 8 9 10 11 12	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all of these things that were part of that.  Q. I understand. And so going to the next page, 388. It says, "Reduce political threats to yourself and your cause."  What did you understand is the political threats to whoever yourself or your cause is there?  A. That was to Guo.
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2 3 4 5 6 7 8 9 10 11 12 13 14	A. I don't have it. Q. Oh, I'm sorry. A. So, what page? Q. The same one we've been looking at, 387.  A. So what would you like to look at? Q. Where it says, "Document everything as leverage to gain concessions, protect people, use as political weapon, or as aid in criminal prosecution and asset recovery"?  A. Correct. Q. What is the what was that about; what does that mean in terms of the services to be provided?  A. This was what Mike was referring to	2 3 4 5 6 7 8 9 10 11 12 13 14	corruption as possible, and he wanted us to investigate and retrieve that kind of corruption. In other words, funds that would have been taken out of the country illegally, cash payments, all of these things that were part of that.  Q. I understand. And so going to the next page, 388. It says, "Reduce political threats to yourself and your cause."  What did you understand is the political threats to whoever yourself or your cause is there?  A. That was to Guo.  Q. Okay.  A. Political threats to Guo and Guo's cause.
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	Titlich Wahop on 02/12/2019				
1	Page 90 preliminary document that Mike had put together;	1	Page 92 with Russian opposition and Chinese expats?		
2	so, no, we were not under contract to look into	2	A. Through me and certain ideas that we		
3	it.	3	had to combine our ideological belief in		
4	Q. Okay. So you didn't do any work	4	democracy.		
5	regarding Mr. Guo or his business prior to	5	Q. And right. How would those ideas be		
6	A. The contract?	6	executed, what sort of		
7	O the execution of the contract on or	7	A. Through dialogue.		
8	about January 6, 2018?	8	O activities?		
9	A. No.	9	A. Through dialogue.		
10	Q. You didn't access your network to	10	Q. And you also have links with Chinese		
11	determine whether this was someone you wanted to	11	people inside Russia?		
12	do business with or not?	12	A. We would have, yes.		
13	A. We had Bill Gertz, who was one of the	13	Q. That's you and Mr. Waller?		
14	finest intellects on Chinese corruption, and	14	A. Yes.		
15	reporters, journalists, and also Lianchao, again,	15	Q. It says, "for propaganda and		
16	of the highest sterling standards. When they	16	organizational purposes." Do you see that?		
17	asked us to look into it, that's what we did.	17	A. Yes.		
18	That was looking into putting together a program	18	Q. What would be the propaganda and		
19	that would help somebody that we believed at the	19	organizational purposes?		
20	time was absolutely anti-communist.	20	A. Media and social media, probably.		
21	Q. I see. So you relied up let me put	21	Q. So, in other words, messaging of		
22	it this way. Strategic Vision relied upon the	22	anti-communist, pro-democracy rhetoric?		
23	recommendation of Bill Gertz and Lianchao Han in	23	A. Correct.		
24	terms of deciding to do business with, or	24	Q. Would the Russian opposition group be		
25	deciding to enter into the research agreement?	25	involved in collecting investigatory research or		
1	Page 91	1	Page 93		
1 2	A. Correct.	1 2	is that a separate group?		
2	A. Correct. Q. Let's just go to SVUS390.	2	is that a separate group?  A. It would be separate.		
2 3	A. Correct. Q. Let's just go to SVUS390. A. Um-hum.	2 3	is that a separate group?  A. It would be separate.  Q. Let's go to 394. It says, "Target		
2 3 4	A. Correct.  Q. Let's just go to SVUS390.  A. Um-hum.  Q. It says, "Network With Russian	2 3 4	is that a separate group?  A. It would be separate.  Q. Let's go to 394. It says, "Target Intelligence Capability: Cost."		
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	Trenen wanop		
1	Page 102 Q. It says, "sign MOU." That's a	1	Page 104 Q. What, if anything, did you tell Mr. Guo
2	memorandum of understanding?	2	about an Abu Dhabi princess?
3	A. That's correct.	3	A. A Saudi it was not Abu Dhabi, it was
4	Q. Is that how Strategic Vision normally	4	Saudi.
5	contracts with its clients?	5	Q. Okay. What did you
6	A. Again, this is a preliminary overview.	6	A. To clarify, it's usual we have to
7	This was a discussion. We were discussing it	7	clarify.
8	openly in a little meeting that we were having	8	Q. Sure. What did you tell Mr. Guo about
9	with Mr. Guo. So this was just sort of a menu of	9	a Saudi princess?
10	deciding what we would do and how we would	10	A. She was my roommate.
11	perform.	11	Q. That was in college?
12	Q. Does Strategic Vision normally sign	12	A. No, in high school.
13	written agreements with its clients?	13	Q. And is she a client of Strategic
14	A. Yes.	14	Vision?
15	Q. Does Strategic Vision have a standard	15	A. No.
16	contract that it uses for its client engagements?	16	Q. Okay. Did you tell Mr. Guo that you
17	A. No.	17	had, or that Strategic Vision had relationships
18	Q. So you don't have a stock agreement	18	with clients in Saudi Arabia?
19	that you normally use when	19	A. Yes.
20	A. No client's the same.	20	Q. And in Iran?
21	Q. So, prior to signing the research	21	A. Many years ago, in Iran.
22	agreement, did you tell Mr. Guo that you had an	22	Q. What about Turkey?
23	in-house team of investigators at Strategic	23	A. Not a client. A relationship.
24	Vision?	24	Q. And what about Qatar, did you tell him
25	A. This is a fascinating misnomer.	25	you had clients in Qatar?
1	Page 103 Q. What what term is that that you're	1	Page 105  A. I did. Past tense. We don't work with
2	calling	2	terrorists.
~	A. No.	3	
3			O Okay What about Republican
3 4			Q. Okay. What about Republican
4	Q a misnomer?	4	politicians, did you ever tell Mr. Guo that you
4 5	Q a misnomer? A. No.	4 5	politicians, did you ever tell Mr. Guo that you worked for Republican politicians?
4 5 6	Q a misnomer?  A. No.  MR. SCHMIDT: Just answer the question.	4 5 6	politicians, did you ever tell Mr. Guo that you worked for Republican politicians? A. Many.
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4 5 6 7 8 9	Q a misnomer?  A. No.  MR. SCHMIDT: Just answer the question.  A. No.  MR. SCHMIDT: Let him follow he'll  follow up if he wants to follow up.	4 5 6 7	politicians, did you ever tell Mr. Guo that you worked for Republican politicians?  A. Many.  Q. So you told him you had that
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	Trench wanop	OII	
1	Page 106 Q. Which president, or nominee?	1	Page 108 Q. I'm just trying to
2	A. Beginning it's okay, it's on the	2	A. There were a lot of drafts running
3	record. Beginning with the campaign for	3	around at the time, so, and the date is not
4	President Reagan, President Bush, Dan Quayle,	4	right.
5	obviously President Trump.	5	
6		6	-
7	Q. Did you tell Mr. Guo about all of these or some of them?	7	agreement in connection with this case?
		8	A. When he asked us to, probably in
8	A. Yes.		around the 15th or so of December of 2017, after
9	Q. Okay.	9	several meetings.
10	A. He asked.	10	Q. Were there any other meetings, other
11	Q. Did you tell him that you had influence	11	than the three we've talked about already, that
12	at the CIA?	12	preceded this drafting?
13	MR. SCHMIDT: Objection, but go ahead.	13	A. You know, you'd have to ask Mike. I
14	A. I never would have used the word	14	don't think so, no.
15	influence.	15	Q. When did you when did you do the
16	Q. How would you put it?	16	first draft? Don't even worry about this
17	A. Channels.	17	document. I don't know if it is the first draft.
18	Q. In other words, you have contacts at	18	A. When we had the vision documents, those
19	the CIA?	19	were sort of the beginning of the discussion.
20	A. Yes.	20	This time to get them was also part of the vision
21	Q. And you could get information from them	21	document that was on the flash drive, and it was
22	that could be useful to a client from the CIA?	22	all in the conversation of trying to understand
23	A. No. That's a trick question.	23	what it was that Guo wanted.
24	Q. No, I'm not trying to trick you. I	24	Q. So how did you go about doing the first
25	didn't if it came out that way, it wasn't my	25	draft? Did you and Mike sit down at a computer
	Page 107		Page 109
1	intent.	1	together, or what was the process?
2	A. Yeah, come on.	2	A. Yes.
3 4	Q. I'm trying to understand what your channels to the CIA, what their use is?	3	Q. Okay. Where was that, at your home in Virginia?
5	A. Information sources that are	5	•
6	unclassified.	6	
7		7	Q. And you sat together and A. Yes.
8	Q. And I would ask you the same question.  Did you tell him that you had contacts or	8	
	-		Q typed it out or
9	channels in the state department?	9 10	A. Sat together and discussed it and
10	A. Yes.		Q. Did you was it handwritten notes
11	Q. Did you ever tell him that you worked	11	that you later had someone transcribe or did
12	for the CIA?	12	you
13	A. Never. Q. Okay. Did you ever tell him that	13	A. No. Q type it on the computer?
15	Mr. Waller worked for the CIA?	15	
16		16	A. No. We just typed it up while we were
17		17	talking.  Q. And did you do the typing or did he?
	MR. GRENDI: Let's go to 8.		
18	(Wallop Exhibit 8, Research Agreement,	18	
19	January 1, 2018, marked for identification.)	19	Q. Okay. And did you keep the original
20	Q. This has been marked Wallop 8. Do you	20	draft that you created?
21	recognize this document at all?	21	A. I think this was the draft. I don't
22	A. This was a draft document to to Guo	22	know.
23	initially.  Q. Who created it?	23	Q. Okay. And do you recall giving Wallop 8 to Mr. Guo or Lianchao or Ms. Wang?
25	<ul><li>Q. Who created it?</li><li>A. I think Mike and I did.</li></ul>	25	A. I'm sure that we gave it to both of
	A. I WILLIN PILNE AUG I ULU.	رے ا	A. I III BUTE CHAC WE GAVE IT TO DOUT OF

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	Trenen wanop	On	
1	Page 114  A. We just had an agreement of trust	1	Page 116 the wire that was sent?
2	between us.	2	A. The wire was not sent until the middle
3	Q. What were the terms of that agreement?	3	of January or so.
4	A. Probably 50/50, plus expenses.	4	Q. Okay. And was that wire for splitting
5	Q. And I take it this wasn't a written	5	the profits or for something else?
6	agreement?	6	A. It was for beginning to start paying
7	A. No. We never needed one.	7	the team as well as beginning to pay Mike.
8	Q. Right. So when did you and well,	8	Q. Oh, so it was both?
9	when did Strategic Vision and Mr. Waller come to	9	A. Yeah. There were two wires. Maybe
10	this 50/50 split agreement?	10	there were three wires, yeah.
11	A. Well, after we had the agreement	11	Q. So how much was the wire for the team?
12	finally signed, it had been going off and on, off	12	And I assume that means Team 1?
13	and on during all of December, we didn't know	13	A. The preliminary amount for Team 1 was
14	whether we had an agreement or not. And then,	14	at least 300,000.
15	when Yvette turned up with the first set of flash	15	Q. And how much of that, if there was a
16	drives that were corrupted, so then I had come to	16	second wire or the same wire, was for Dr. Waller?
17	New York we didn't have an agreement, per se.	17	A. Then there was a separate wire for
18	We had a signed agreement. We had no funds at	18	about 200 for Dr. Waller. It could have been
19	the time, at the first at the tail end of	19	250, I have to look. We haven't done our tax
20	December, when we were still all talking after	20	thing yet on it. But about 250. And then there
21	Christmas.	21	was an additional amount for expenses.
22	And, finally, the funds turned up	22	Q. How much was that expense amount wire,
23	I'm trying to answer your question here. When	23	if you recall?
24	the funds turned up in, like, the 2nd or 3rd of	24	A. Well, I think we're talking about
25	January of 2018, we still didn't know whether	25	travel, and because he had to do a lot of the
			2
1	Page 115 that was even going to work, and then they turned	1	Page 117 face-to-face collection, and last minute, which
2	up from somebody we'd never heard of, and so	2	costs a lot more; probably between 25 and 50, I
3	forth and so on. So we had to sit down and	3	can't remember, thousand.
4	decide what was going to go for the teams that we	4	O. And is that the full extent of the
5	were going to use and how we were going to	5	amount of money that's been paid to Dr. Waller in
6	allocate the expenses and so forth.	6	connection with the research agreement that's the
7	Q. So when when was the point in time	7	subject of this litigation?
8	when Strategic Vision and Mr. Waller decided how	8	A. I think there was a bit more, maybe
9	they were going to, as you described it, split	9	another 50, and that was based on certain
10	the split it 50/50?	10	invoices that he had for for things that he
11	A. Not until sometime in January.	11	was that we had to pay.
12	Probably the end of January.	12	Q. I see. And so what about let's just
13	Q. So, well after the contract had been	13	set aside Dr. Waller. Were there any other costs
14	signed	14	that Strategic Vision incurred in connection with
15	A. Yes.	15	this research agreement that didn't go through
16	Q and the	16	Dr. Waller or one of his entities?
17	A. We were trying to figure out what	17	A. There were there was a lot of travel
18	things were going to cost.	18	expense for Strategic Vision, face-to-face time
19	Q. You said before that Strategic Vision	19	with these individuals overseas that I had to do.
20	had sent money to Mr. Waller, or Dr. Waller?	20	There was there were other entities that were
21	A. When?	21	also contracted to retrieve information.
22	Q. I'm asking. That's what my question	22	Q. Let's go one at a time, I'm sorry to
23	is.	23	hop in. But what were your what were
24	A. No. I mean	24	Strategic Vision's kind of direct travel
			_
25	Q. You said there was a wire. What was	25	expenses?

	Trench wanop		
1	Page 118  A. Oh, I would say probably at least	1	Page 120 travel, time spent working on this, lots of
2	50,000.	2	different meetings with different people to try
3	Q. And does Strategic Vision have records	3	to collect data.
4	and bank statements that would memorialize or	4	Q. Did Strategic Vision ever turn away any
5	otherwise reflect all these payments you're	5	clients because of this engagement?
6	talking about here today?	6	A. Yes, we did.
7	A. We would be able to give you an idea as	7	Q. When was that?
8	to what the costs are, yes.	8	A. It was probably in March.
9	Q. So those records do exist?	9	Q. Of what year?
10	A. The records, the receipts, yes.	10	A. I'm sorry.
11	(*r) MR. GRENDI: Joe, obviously we're going	11	Q. That's okay.
12	to call for the production of those	12	A. 2018.
13	documents, we'll obviously send you a	13	Q. Sure. March of 2018. And why did
14	letter, but to put that on the record.	14	Strategic Vision turn that client away?
15	Q. I'm sorry, you were saying after travel	15	A. Because we were still working on this,
16	expenses, there were other costs as well?	16	we believed. It could have been February, too.
17	A. Yes.	17	I'd have to ask Mike.
18	Q. What were those?	18	Q. And what's the name of that potential
19	A. The hiring of individuals overseas to	19	client?
20	retrieve certain information that was only	20	A. I can't tell you.
21	only in the U.K. or in Switzerland or in the	21	Q. So you're refusing to tell me that
22	Middle East.	22	because?
23	Q. Okay. And these are this is	23	A. I can't tell you.
24	separate from Team 1?	24	Q. No, I'm asking why you're not telling
25	A. Yes.	25	me?
1	Page 119 Q. And what was the cost of, let's just	1	Page 121 A. It's confidential.
2	say, the team you used to get information out of	2	MR. SCHMIDT: Can you describe in
3	the U.K.?	3	general terms at all or?
"		"	
4	A. IT WAS ADOUT ZU,UUU U.S. GOLLARS.	4	THE WITNESS: Obviously, I cannot.
4 5	A. It was about 20,000 U.S. dollars.  O. Is that a group called Fletcher?	4 5	THE WITNESS: Obviously, I cannot.  MR. SCHMIDT: Okav.
5	Q. Is that a group called Fletcher?	5	MR. SCHMIDT: Okay.
	<ul><li>Q. Is that a group called Fletcher?</li><li>A. That's correct.</li></ul>		MR. SCHMIDT: Okay. MR. GRENDI: I mean, obviously, we
5 6 7	<ul><li>Q. Is that a group called Fletcher?</li><li>A. That's correct.</li><li>Q. Okay. What about, you said that maybe</li></ul>	5 6 7	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of
5 6 7 8	Q. Is that a group called Fletcher?  A. That's correct.  Q. Okay. What about, you said that maybe a team in Switzerland or somewhere else?	5 6 7 8	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of confidentiality here, and we'll deal with it
5 6 7	<ul><li>Q. Is that a group called Fletcher?</li><li>A. That's correct.</li><li>Q. Okay. What about, you said that maybe</li></ul>	5 6 7	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of
5 6 7 8 9	Q. Is that a group called Fletcher?  A. That's correct.  Q. Okay. What about, you said that maybe a team in Switzerland or somewhere else?  A. Yes.	5 6 7 8 9	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of confidentiality here, and we'll deal with it at a later date.
5 6 7 8 9	Q. Is that a group called Fletcher?  A. That's correct.  Q. Okay. What about, you said that maybe a team in Switzerland or somewhere else?  A. Yes.  Q. What was the cost of that other team?	5 6 7 8 9	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of confidentiality here, and we'll deal with it at a later date.  Q. So why was it that this confidential client couldn't be engaged?
5 6 7 8 9 10 11	Q. Is that a group called Fletcher?  A. That's correct. Q. Okay. What about, you said that maybe a team in Switzerland or somewhere else?  A. Yes. Q. What was the cost of that other team? A. I'd have to look. I can't remember.	5 6 7 8 9 10 11	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of confidentiality here, and we'll deal with it at a later date.  Q. So why was it that this confidential client couldn't be engaged?
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Is that a group called Fletcher?  A. That's correct.  Q. Okay. What about, you said that maybe a team in Switzerland or somewhere else?  A. Yes.  Q. What was the cost of that other team?  A. I'd have to look. I can't remember.  But it was minimal. I mean, it wasn't it wasn't it's like maybe 8, \$10,000, something like that.  Q. Right.  A. Some of it had to be done in cash.  Q. How much of it was done in cash?  A. Maybe that amount.  Q. Eight to 10,000?  A. Eight to 10,000, perhaps. I hate cash.  Q. If you would take a moment, are there	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of confidentiality here, and we'll deal with it at a later date.  Q. So why was it that this confidential client couldn't be engaged?  A. We had a lot on our plate.  Q. And how much was this potential client willing to engage Strategic Vision for?  A. We hadn't gotten that far.  Q. So you don't know whether the A. No.  Q potential client was going to be a valuable one or not?  A. No, I don't know. I'd have to I'd have to talk to Mike about it.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Is that a group called Fletcher? A. That's correct. Q. Okay. What about, you said that maybe a team in Switzerland or somewhere else? A. Yes. Q. What was the cost of that other team? A. I'd have to look. I can't remember. But it was minimal. I mean, it wasn't it wasn't it's like maybe 8, \$10,000, something like that. Q. Right. A. Some of it had to be done in cash. Q. How much of it was done in cash? A. Maybe that amount. Q. Eight to 10,000? A. Eight to 10,000, perhaps. I hate cash. Q. If you would take a moment, are there any other costs that you can think of that	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of confidentiality here, and we'll deal with it at a later date.  Q. So why was it that this confidential client couldn't be engaged?  A. We had a lot on our plate.  Q. And how much was this potential client willing to engage Strategic Vision for?  A. We hadn't gotten that far.  Q. So you don't know whether the A. No.  Q potential client was going to be a valuable one or not?  A. No, I don't know. I'd have to I'd have to talk to Mike about it.  Q. Was it Mike's client or your client, or
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Is that a group called Fletcher? A. That's correct. Q. Okay. What about, you said that maybe a team in Switzerland or somewhere else? A. Yes. Q. What was the cost of that other team? A. I'd have to look. I can't remember. But it was minimal. I mean, it wasn't it wasn't it's like maybe 8, \$10,000, something like that. Q. Right. A. Some of it had to be done in cash. Q. How much of it was done in cash? A. Maybe that amount. Q. Eight to 10,000? A. Eight to 10,000, perhaps. I hate cash. Q. If you would take a moment, are there any other costs that you can think of that Strategic Vision incurred because of this	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. SCHMIDT: Okay.  MR. GRENDI: I mean, obviously, we don't accept that assertion of confidentiality here, and we'll deal with it at a later date. Q. So why was it that this confidential client couldn't be engaged?  A. We had a lot on our plate. Q. And how much was this potential client willing to engage Strategic Vision for? A. We hadn't gotten that far. Q. So you don't know whether the A. No. Q potential client was going to be a valuable one or not?  A. No, I don't know. I'd have to I'd have to talk to Mike about it. Q. Was it Mike's client or your client, or Strategic Vision's client I should say?

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		nen wanop on	
1	MR. GRENDI: So another 15 m	Page 126 inutes.	Page 128 as to how best to visualize, so to speak, the
2	Let's do Strategic Vision 9.	2	whole concept of this agreement, we used an
3	(Wallop Exhibit 9, Research	Agreement 3	example of like, it's like fish in a tank. So if
4	dated December 29, 2017, marked fo	-	you put the ten fish, or, as it turned out to be,
5	identification.)	5	15 fish in the tank, and one of the fish
6	Q. Ms. Wallop, do you recognize	this 6	forgive me died, but we didn't want to use the
7	document?	7	word died, if one of the fish wasn't a useful
8	A. I do.	8	fish on the information that we were trying to
9	Q. That's your signature on the	last page 9	pull, we would take that fish out and put a new
10	there?	10	fish, meaning a new name, into the tank, and we
11	A. It is.	11	would run the investigative background on that
12	Q. Were you physically present	when this 12	new fish, as well as the other nine fish.
13	contract was executed?	13	So, that's where the whole concept of
14	A. Yes.	14	the fish tank came from. He loved it. He
15	Q. And who else was there?	15	couldn't wait to use it. It was a big deal to
16	A. Yvette Wang.	16	him. So, fine, we kept talking about fish. So,
17	Q. Anyone else?	17	for whatever reason, that's why it ended up in
18	A. No.	18	this sort of contract agreement.
19	Q. Dr. Waller wasn't physically	present? 19	I realize that it's not the usual kind
20	A. No.	20	of contract terminology that I would have used,
21	Q. Was he on a conference call	or 21	but he loved it, and so we used it, and so he
22	telephoned in during the time that this	agreement 22	understood it, and that's why we moved forward
23	was signed?	23	with it
24	A. No.	24	Q. I just want to know where the concept
25	Q. The agreement references the	laws of 25	came from. Did he start using the term fish or
1	the state of Nevada in that second para	Page 127 qraph, do 1	Page 129 did you; kind of like you saw a fish tank and you
2	you see that?	2	said, well, it's just like if you took fish in
3	A. Correct.	3	and out of a tank?
4	Q. Where did that come from?	4	A. Well, we were talking in hypotheticals.
5	A. Because Strategic Vision is		He didn't understand how we would have to just
6	in the state of Nevada.	registered 5	take different names out of different sort of
7	Q. So you put that in there bec		collection points
8	where Strategic Vision is incorporated?		Q. I see.
9	A. Correct.	9	A so we just used a really simple
10	Q. And there's some, I'll call		analogy of a fish tank. And you put the ten fish
11	jargon in this contract about fish, do	_	in, as it turned out for the first month 15, and
12	that?	you recall   11	then they you know, you pull one out if you
13	A. Yes.	13	found that it wasn't going anywhere; in other
14	Q. Where did the term fish come		words, if it was a dead end. A lot of these
15	A. Guo was having a hard time	15	Chinese names used fake names. That's a whole
16	understanding how how we would select		other thing we can get into.
17	the concept of investigation and the nu		Q. Sure. And has Strategic Vision ever
18	instance, per month. The the whole		used this fish, or fish tank terminology
19	he showed us had the original file,		A. Never.
20	exhibit that was, in fact, had at least		Q in connection with
21	in it, which was reduced down to 30 nam		Just let me finish my question.
22	was then reduced down to the ten names,		A. Sorry.
23	they switched and wanted to have 15 names,		Q with any other client?
24	first month.	24	A. Never.
25	So, in order to give him an		Q. I take it from your expression that you
	55, III OLGEL EO GIVE IIIII GII		y. I call It II'm your expression that you

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1	Page 130 found it silly or ridiculous?	1	Page 132 high quality original research and prepare
2	A. I did, but it helped him understand the	2	reports on subjects chosen at the client's
3	concept.	3	discretion."
4	Q. It says here that, "Any and all	4	Do you see that in that following
5	materials provided by the client, that's Eastern	5	sentence?
6	Profit, to the contractor, that's Strategic	6	A. Correct, yes.
7	Vision, will be treated with absolute	7	Q. What original research did Strategic
8	confidentiality and will not be shared by the	8	Vision do in connection with this contract?
9	contractor with any other entity."	9	A. Based upon what we received, we then
10	Do you see that in the third paragraph	10	started diving into pulling information.
11	of this research agreement?	11	Q. When you say we, are you talking about
12	A. Yes.	12	the entity Strategic Vision or other people, like
13	Q. What how does that work with	13	teams?
14	Strategic Vision in terms of sharing information	14	A. Teams, and Mike and myself.
15	with other entities?	15	Q. Was there anyone else that did the
16	A. Well, we had to share it with the	16	research, other than those three entities that
17	teams, in other words, for them to be able to do	17	you just referred to, yourself, Mr. Waller, or
18	the research.	18	Dr. Waller, and the teams?
19	Q. Does the contract discuss that at all?	19	A. The groups in the individual ones in
20	A. It's very clear. You can't have an	20	both Europe and in the U.K.
21	agreement you can't do the research unless you	21	Q. Is that, you mean Fletcher
22	give it to the teams to do the research, right?	22	A. Yes.
23	Q. I just asked you if that was in the	23	Q and the other entity that you
24	agreement?	24	referred to
25	A. Yes.	25	A. Yes.
		1	
	Page 131		Page 133
1	Q. Where?	1	Q I guess, in Switzerland?
1 2		1 2	
	Q. Where?		Q I guess, in Switzerland?
2 3 4	Q. Where?  A. With any other entity. "Will not be shared by any other entity." It's not an empty, it was a team. An entity would be the Washington	2	Q I guess, in Switzerland? A. Yes. Q. It says, "The contractor will produce complete research reports and provide all
2 3 4 5	Q. Where?  A. With any other entity. "Will not be shared by any other entity." It's not an empty, it was a team. An entity would be the Washington Post, or you, or a third or fourth party that has	2 3 4 5	Q I guess, in Switzerland? A. Yes. Q. It says, "The contractor will produce complete research reports and provide all supporting data as indicated below." Do you see
2 3 4 5 6	Q. Where?  A. With any other entity. "Will not be shared by any other entity." It's not an empty, it was a team. An entity would be the Washington Post, or you, or a third or fourth party that has nothing to do with this research agreement.	2 3 4 5 6	Q I guess, in Switzerland? A. Yes. Q. It says, "The contractor will produce complete research reports and provide all supporting data as indicated below." Do you see that, two or three sentences down?
2 3 4 5 6 7	Q. Where? A. With any other entity. "Will not be shared by any other entity." It's not an empty, it was a team. An entity would be the Washington Post, or you, or a third or fourth party that has nothing to do with this research agreement.  Q. So I just want to understand that. So	2 3 4 5 6 7	Q I guess, in Switzerland? A. Yes. Q. It says, "The contractor will produce complete research reports and provide all supporting data as indicated below." Do you see that, two or three sentences down? A. Yes.
2 3 4 5 6 7 8	Q. Where? A. With any other entity. "Will not be shared by any other entity." It's not an empty, it was a team. An entity would be the Washington Post, or you, or a third or fourth party that has nothing to do with this research agreement.  Q. So I just want to understand that. So then, the contractor referred to in the contract	2 3 4 5 6 7 8	Q I guess, in Switzerland? A. Yes. Q. It says, "The contractor will produce complete research reports and provide all supporting data as indicated below." Do you see that, two or three sentences down? A. Yes. Q. So was Strategic Vision going to
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2 3 4 5 6 7 8 9	Q. Where? A. With any other entity. "Will not be shared by any other entity." It's not an empty, it was a team. An entity would be the Washington Post, or you, or a third or fourth party that has nothing to do with this research agreement. Q. So I just want to understand that. So then, the contractor referred to in the contract refers to more than just Strategic Vision? A. Our teams.	2 3 4 5 6 7 8 9	Q I guess, in Switzerland? A. Yes. Q. It says, "The contractor will produce complete research reports and provide all supporting data as indicated below." Do you see that, two or three sentences down? A. Yes. Q. So was Strategic Vision going to produce all the reports or were the teams going to create some of them?
2 3 4 5 6 7 8 9 10	Q. Where? A. With any other entity. "Will not be shared by any other entity." It's not an empty, it was a team. An entity would be the Washington Post, or you, or a third or fourth party that has nothing to do with this research agreement. Q. So I just want to understand that. So then, the contractor referred to in the contract refers to more than just Strategic Vision? A. Our teams. Q. Okay.	2 3 4 5 6 7 8 9 10	Q I guess, in Switzerland? A. Yes. Q. It says, "The contractor will produce complete research reports and provide all supporting data as indicated below." Do you see that, two or three sentences down? A. Yes. Q. So was Strategic Vision going to produce all the reports or were the teams going to create some of them? A. The teams were going to develop them on
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Where? A. With any other entity. "Will not be shared by any other entity." It's not an empty, it was a team. An entity would be the Washington Post, or you, or a third or fourth party that has nothing to do with this research agreement. Q. So I just want to understand that. So then, the contractor referred to in the contract refers to more than just Strategic Vision? A. Our teams. Q. Okay. A. You understand the teams that we had to use. Q. I'm just trying to understand what the contract says. Does the contract say anything about teams? A. Well, if you're in the business, you understand teams are teams, and you have to use a team with a as a part of the contract. He knew perfectly well what that meant. Q. I just asked you whether the contract said it, that's all.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q I guess, in Switzerland? A. Yes. Q. It says, "The contractor will produce complete research reports and provide all supporting data as indicated below." Do you see that, two or three sentences down? A. Yes. Q. So was Strategic Vision going to produce all the reports or were the teams going to create some of them? A. The teams were going to develop them on the flash drives. We were not going to do any written reports. Q. Why wouldn't you do any why wouldn't Strategic Vision do any written reports? A. Because we were trying to keep it as secure as possible. Q. But you understood that the other teams strike that. Let me start over. Strategic Vision understood that its teams would create written reports?  MR. SCHMIDT: Objection. A. No.

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1	Page 134	1	Page 136
1	written report.	1 2	confused. I don't know what you're asking.
2	Q. No, I know, I understand that. I'm	3	MR. GRENDI: All right. I mean
3	trying to understand whether Strategic Vision		MR. SCHMIDT: I think you got to back
4	understood whether its teams or independent	4	way up and start this over.
5	contractors would produce written reports?	5	MR. GRENDI: Well, we're getting why
6	A. We would not produce written reports,	6	don't we do lunch. We'll start over on
7	or we had no intention of doing that. This	7	this. It's no big deal.
8	was these were face-to-face meetings,	8	THE VIDEOGRAPHER: Off the record at
9	face-to-face information, USB flash drives.	9	12:57.
10	Q. Oh, I understand.	10	(Whereupon, a short recess was taken.)
11	A. It was	11	THE VIDEOGRAPHER: Back on the record
12	Q. Maybe we're having a semantic	12	at 1:01.
13	A. It was Guo's sorry. It was Guo's	13	Q. How did Strategic Vision intend to
14	insistence on the security measure.	14	deliver the reports described in this research
15	Q. I want to clarify something here. Do	15	agreement?
16	you understand written to mean just like	16	A. Directly to the designated driver, the
17	something written on a piece of paper as opposed	17	designated agent for Mr. Guo, who was either
18	to electronic?	18	going to be Lianchao, then it became Yvette, and
19	MR. SCHMIDT: That's how I understood	19	then it became Lianchao again. So we would give
20	it.	20	it to them or Guo directly on a USB key.
21	A. Yes.	21	Q. So there would be electronic documents
22	MR. SCHMIDT: That's how the question	22	on a USB?
23	was. You went from flash drives to USBs	23	A. Correct.
24	MR. GRENDI: No, hold on. Hold on.	24	Q. And would any of those documents be a
25	MR. SCHMIDT: into written reports.	25	report in narrative form?
	Dogg 125		Dogg 127
1	Page 135 So a written report is a written report. It	1	Page 137  A. I never saw them until later, until
2	has a standard connotation. So you might	2	after all of this started. I never saw any of
3	have to redo this.	3	the documentation. Again, compartmentalizing.
4	MR. GRENDI: Yeah, let's let's break	4	Q. Right. So Strategic Vision never
5	it out. I didn't get it. I always think of	5	reviewed any of the documents that were delivered
6	writing as both.	6	to either Lianchao Han or Yvette Wang under this
7	Q. So, including electronic documents, did	7	research agreement?
8	you understand that written materials would be	8	MR. SCHMIDT: Objection. Go ahead.
9	produced?	9	A. No.
10	A. No.	10	Q. And I'll just ask about you personally.
11	Q. So you never Strategic Vision never	11	You personally didn't review any of the documents
12	contemplated providing any written materials to	12	that were delivered to Lianchao Han or Yvette
13	Eastern Profit?	13	Wang under this research agreement?
14	A. Correct.	14	A. No, because of the timing and the
15	Q. So Strategic Vision understood	15	logistics.
16	everything would be conveyed orally to the	16	Q. Okay. What is financial forensic
17	client?	17	historical research?
18	A. Via flash drive.	18	A. What do you mean?
19	Q. So flash drive would be allowed.	19	• • • • • • • • • • • • • • • • • • •
20	That's I'm including a flash drive as a	20	<del>-</del>
	_		Eastern 5, on the first page there?
21	writing. In other words, if something is typed	21	A. Yes.
22		22	Q. Have you used that term before in
22	or handwritten on a piece of paper, that's a	22	No.
23	writing. Can we agree on that?	23	A. Yes.
23 24	writing. Can we agree on that?  A. No.	24	Q other research agreements?
23	writing. Can we agree on that?		

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1	Q. And are these kind of standard terms or	1	to our detriment; we said, it was not legal to do
2	items that would be included in financial	2	what he wanted to be done, so.
3	forensic historical research?	3	Q. So in terms of the you understood
4	A. It would be, particularly if you're	4	that the client wanted everything in terms of
5	looking at information you're trying to get in	5	financial forensic historical research?
6	the way of money laundering or cash purchases;	6	A. That's correct.
7	for instance, there were cash purchases of	7	Q. And then you kind of put together this
8	houses, cash purchases by these fish. We were	8	list here of everything you could think of that
9	tracking their individual financial spending	9	you could access?
10	habits, how they could have a house, how they	10	A. We put together the list first.
11	could have a car, when they only had \$2,500 in a	11	Q. Okay.
12	credit card limit.	12	A. And then he kept saying he wanted more
13	I mean, there were multiple layers and	13	and more and more.
14	levels of investigation that go on into	14	Q. Oh, so do you recall adding, you know,
15	financial, forensic accounting, or research in	15	different items to this A tab, forensic
16	this case.	16	historical research, to include more items that
17	Q. This kind of list of different things	17	he was demanding?
18	that could be researched, including statements,	18	A. No. He demanded it verbally.
19	capital sources, etc., do you see that list with	19	Q. Okay.
20	all those commas there?	20	A. I think it was around the 26th of
21	A. Yes.	21	January, that, I do remember, where he was
22	Q. Was that a list that you and Dr. Waller	22	insistent; I don't care what it takes, get it,
23	put together in terms of Strategic Vision's	23	get it. We said, you have to take your time.
24	capabilities?	24	Q. And it talks about on the next page,
25	A. What we would have been able to have	25	Eastern 6, progress reports. It says,
	D 120		
			Dogo 141
1	Page 139 researched there are two ways of looking at	1	Page 141 "contractor will produce a progress report on"
1 2	researched there are two ways of looking at	1 2	e e e e e e e e e e e e e e e e e e e
			"contractor will produce a progress report on" A. Where is this?
2	researched there are two ways of looking at it. Stateside, what anybody can do that is into	2	"contractor will produce a progress report on" A. Where is this? Q. It's the, I guess, the first full
2 3	researched there are two ways of looking at it. Stateside, what anybody can do that is into this field.  Q. Right.	2 3	"contractor will produce a progress report on" A. Where is this?
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	French Wallop	on (	02/12/2019
1	Page 142		Page 144
1	Q. Has the term progress report been used	1	a progress report and a preliminary report?
2	by Strategic Vision in other contracts it has	2	A. I have no idea how to answer that,
3	with its clients?	3	except that I'm trying to explain to you that it
4	A. It depends on the terms of the	4	is, in fact, a face-to-face conversation. It is
5	contract.	5	not in writing.
6	Q. I'm asking if you recall?  A. I don't recall.	6	Q. I understand that.
-			A. Okay. So what's the problem on the
8	Q. So progress reports are not a standard	8	question? I don't understand.
9	term that Strategic Vision uses in other research	9	Q. I want to understand what the
10	agreements?	10	difference is between them.
	MR. SCHMIDT: Objection.		A. A written report and a verbal report?
12	A. Progress reports have different	12	Q. Not a written report, no. Let me ask
13	definitions depending upon the security and	13	my question. It says, a weekly progress
14	the each individual client's situation. They	14	report
15	are not all the same.  O. I understand.	15	A. Yes.
16	ž. – <del>1</del>	16	Q and one preliminary report at the
17	A. So they're not all the same.	17	end of the first month, or in the first month.
18	Q. Okay.	18	A. All right.
19	A. A progress report if somebody wants		Q. And I want to know if, to Strategic
20	a progress report on how their cat is doing, we	20	Vision, is there a difference between the
21	can do a progress report on how the cat is, or	21	contents of a progress report and a preliminary
22	how a house is, or a real estate is. But this is	22	report. I'm talking about contents, not delivery
23	highly confidential and a secure confidential	23	method.
24	compartmentalization of information that was	24	A. Depending upon how much we've been able
25	vital to him, to Guo.	25	to gather, the preliminary report is precisely
1	Page 143 Q. What about preliminary reports?	1	Page 145 that; that's just the beginning, that's like the
2	A. There is no terminology on here on	2	first paragraph in a novel. The next
3	preliminary reports, other than face-to-face.	3	conversation, which is what happened, the next
4	That's what we were relying on, was face-to-face.	4	conversation was an update on the material and
5	Q. If you look at the next sentence, it	5	the information that we had already gathered. So
6	says or, actually, the same sentence. It	6	it was all still verbal, face-to-face. There is
7	says, "the contractor will produce a progress	7	no written report.
8	report on this financial, forensic research each	8	Q. And what about a historical research
9	week in the first month." Then it says, "one	9	report, one comprehensive historical research
10	preliminary report in the first month."	10	report; what were the contents
11	A. Which we did. We exceeded that.	11	A. And that was
12	Q. Let me ask you this. What does a	12	Q whether it's conveyed orally or in
13	preliminary report include?	13	writing or electronically, what would the
14	A. Verbal report, face-to-face, which is	14	contents of a comprehensive historical research
15	what we were doing when we had the meetings with	15	report be?
16	Guo in his apartment.	16	A. That would have been the findings that
17	Q. I think you're misunderstanding my	17	would have been coming from our teams, or team in
18	question. I'm trying to understand what the	18	this case, which would have been the USB or flash
19	contents of a preliminary report would be, as	19	drive.
20	compared to a progress report?	20	Q. And what would typically be in a
21	A. It would be a verbal report and	21	comprehensive historical research report? What
22	updating him on what the circumstances were and	22	kind of level of information would be there?
23	what we were gathering and how we were gathering	23	A. Since we were trying to get something
24	it. That's a preliminary report.	24	within ten days of the contract commencing, and
25	Q. So there's really no difference between	25	he was adamant about getting something
1 -	~	-	

			02/12/2019
1	Page 150  A. It was all done with Team 1. Team 1	1	Page 152 context?
2	was doing it.	2	A. All the information we were mandated to
3	Q. So Team 1 was assigned the A, B and C	3	investigate.
4	described here on Eastern 5 and 6?	4	Q. And why USB only; was that a Strategic
5	A. They were assigned the entire menu.	5	Vision concept or Mr. Guo or someone else?
6	That was their job. Even though it was separated	6	A. It was Guo, as well as our own sense of
7	out, they knew exactly what their mandate was.	7	security on this investigation. We were
8	O. And the social media research reports,	8	investigating, according to Guo, a number of the
9	again, is there any distinction between how	9	communist Chinese hierarchy leadership and their
10	they're created and the other reports,	10	children in the United States, and it was
11	conceptually?	11	could have been life-threatening for all of us.
12	A. We didn't have time. We what we	12	So it was only on USB key, and, hence, the
13	were pulling in ten days was remarkable. Nobody	13	security issue.
14	can pull it in ten days. So you have a	14	Q. Did Strategic Vision understand that
15	three-month contract that you're signed on to,	15	all the fish in Exhibit 7 were living in the U.S.
16	and you believe that you've got three months to	16	or had property in the U.S.?
17	pull the entire set of information retrieval	17	A. Some of no. Some of them did and
18	that's necessary, and you're given ten days,	18	some of them didn't. I you know, you'd have
19	while somebody's squawking about, oh, my, you	19	to go through them individually to see which ones
20	know, it it's not all there.	20	have what.
21	Well, it can't possibly be all there.	21	Q. And so is that why Strategic Vision
22	Nobody can have it there in ten days. You can't	22	needed a U.S. team, because there was
23	build a team, collect the beginnings of all of	23	U.Slocated fish?
24	these things, unless you want to be shut down	24	A. There was U.Slocated information,
25	immediately.	25	like fake passport numbers, fake Social Security
23	initiation in the second secon	25	Time rance pubblished manuscript, rance bootest becarrey
	Page 151		Page 153
1 1	O I just cont to be gloss though Did	1	
1	Q. I just want to be clear, though. Did	1	numbers, fake names, Chinese, fake. A lot of
2	Strategic Vision deliver any social media	2	numbers, fake names, Chinese, fake. A lot of fakes.
2 3	Strategic Vision deliver any social media research reports?	2 3	numbers, fake names, Chinese, fake. A lot of fakes.  Q. In the United States?
2 3 4	Strategic Vision deliver any social media research reports?  A. I'm sure we did, somewhere.	2 3 4	numbers, fake names, Chinese, fake. A lot of fakes.  Q. In the United States?  A. In the United States. On the list that
2 3 4 5	Strategic Vision deliver any social media research reports?  A. I'm sure we did, somewhere. Q. Did you verbally deliver a social media	2 3 4 5	numbers, fake names, Chinese, fake. A lot of fakes.  Q. In the United States?  A. In the United States. On the list that Guo gave us.
2 3 4 5 6	Strategic Vision deliver any social media research reports?  A. I'm sure we did, somewhere. Q. Did you verbally deliver a social media research report to the client?	2 3 4 5 6	numbers, fake names, Chinese, fake. A lot of fakes.  Q. In the United States?  A. In the United States. On the list that Guo gave us.  Q. It says on Eastern 7 that, "the
2 3 4 5 6 7	Strategic Vision deliver any social media research reports?  A. I'm sure we did, somewhere. Q. Did you verbally deliver a social media research report to the client? A. I believe we did.	2 3 4 5 6	numbers, fake names, Chinese, fake. A lot of fakes.  Q. In the United States?  A. In the United States. On the list that Guo gave us.  Q. It says on Eastern 7 that, "the contractor guarantees that all information
2 3 4 5 6 7 8	Strategic Vision deliver any social media research reports?  A. I'm sure we did, somewhere. Q. Did you verbally deliver a social media research report to the client? A. I believe we did. Q. When would that have been?	2 3 4 5 6 7 8	numbers, fake names, Chinese, fake. A lot of fakes.  Q. In the United States?  A. In the United States. On the list that Guo gave us.  Q. It says on Eastern 7 that, "the contractor guarantees that all information provided is genuine." Do you see that?
2 3 4 5 6 7 8	Strategic Vision deliver any social media research reports?  A. I'm sure we did, somewhere. Q. Did you verbally deliver a social media research report to the client?  A. I believe we did. Q. When would that have been? A. Sometime during between December and	2 3 4 5 6 7 8	numbers, fake names, Chinese, fake. A lot of fakes.  Q. In the United States?  A. In the United States. On the list that Guo gave us.  Q. It says on Eastern 7 that, "the contractor guarantees that all information provided is genuine." Do you see that?  A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Strategic Vision deliver any social media research reports?  A. I'm sure we did, somewhere. Q. Did you verbally deliver a social media research report to the client? A. I believe we did. Q. When would that have been? A. Sometime during between December and January of 2017, '18. They were verbally, verbally. And we may have had some documentation. I can't remember. Q. And what about current tracking research, how was that conveyed to Ms. Wang or Lianchao Han? A. Mike did it with the USB key. Q. And that was on January 30th of 2018? A. Yes. Q. Any other time? A. Yes, there was another USB key earlier, I think. Q. It says on Eastern 7 that "all	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	numbers, fake names, Chinese, fake. A lot of fakes.  Q. In the United States? A. In the United States. On the list that Guo gave us. Q. It says on Eastern 7 that, "the contractor guarantees that all information provided is genuine." Do you see that? A. Yes. Q. It's in the criteria section. A. Sure. Q. How does Strategic Vision guarantee that its information is genuine? A. Based upon the individuals from whom we were retrieving the information, providing of course we were given not given fake names and fake passports and fake criteria to investigate. Q. I just want to understand Strategic Vision's process, though. How does it normally go about guaranteeing the genuineness of the information being provided to its clients? A. Because we trust our sources, and our

provided by its sources?  A. That's part of the idea that we had  with having Team 1 and Team 2.  The provided by its sources?  A. That's why pure talking about with  to the — how to get them document?  sure, double verifying the same fact. You have a  birtiday over here and you have a birthday over  there is now to get them document?  there, they should be the same birthday. If  they're not, there's something that we need to  look at on a secondary basis.  If you have a passport number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, as U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. S. passport, at U.S. visa number over  the here, at il. deport the atch what we have within  the state department, there's an issue. So we  have to then up down that rabbit hole.  The state department, there's an issue.  The state department of the state of the		French Wallop	on (	02/12/2019
and we find out really your name is Joe Schmidt, the victor of the idea that we had the having Teem 1 and Teem 2.  That's what you're talkling about with the the — how to get them document?  A. Youh. It's cross-checking, it's making sure, double verifying the same fact. You have a birthday over here and you have a birthday over there. They should be the same birthday. If they're not. there's concthing that we need to look at on a secondary hasis.  If you have a passport marber over there, a U.S. passport. a U.S. vica marber over there, and it doesn't match what we have within the state department, there's an issue. So we the state department, there's an issue. So we the have to then go down that rabbit hole. That's day it was extremely — not couldn't.  A. Matewer that is.  O. You're saying that — that's the list of fish?  A. That's correct.  O. I see. And that's how Strategic vision typically feels confortable guaranteeing that all the information it's getting from its sources?  A. That's correct.  O. Did Strategic Vision have an  Page 155  opportunity to verify that the information being provided was genuine in this instance.  Page 157  A. Yes and which part is no?  A. Yes.  O. No. I'm asking about what happened in this instance, with this research agreement. Was genuine?  A. Yes.  O. Row, How does that work's which part is yes and which part is no?  A. Yes.  O. No. I'm asking about what happened in this instance, with this research agreement. Was genuine?  A. Yes.  O. Row, How does that work's which part is yes and which part is no?  A. Yes.  O. No. I'm asking about what happened in this instance, with this research agreement. Was genuine?  A. Yes.  O. Bow did Strategic Vision do that?  A. Yes.  O. Bow did Strategic Vision do that?  A. Yes.  O. Bow did Strategic Vision do that?  A. Yes.  O. Bow did Strategic Vision do that?  A. Yes.  O. Bow did Strategic Vision do that?  A. Yes.  O. Bow did Strategic Vision do that?  A. Yes.  O. Bow did Strategic Vision do that?  A. Yes.  O. Bow did Strategic Vision do that?		Page 154		Page 156
3 with having Team 1 and Team 2. 4 0. That's what you're talking about with the — hew to get them document? 5 km — hew to get them document? 6 A. Yeah. It's crose-checking, it's meking sure, double verifying the same fact. You have a birthday over here and you have a birthday over a birthday over here and you have a birthday over a birthday over here and you have a birthday. If they're not, there's anothing that we need to 10 look at on a secondary hasis. 12 If you have a passport number over 11 look at on a secondary hasis. 13 here, and it doesn't match what we have within 15 the state department, there's an issue. So we have to then go down that rabbit bole. 16 have to then go down that rabbit bole. 17 O. And that's a synthesis or an analysis process that Strategic Vision typically does with 19 the information it's getting from its sources? A. That's correct. 20 Did Strategic vision have an 25 instance, on page 3, you have Amita. 26 A. Nes. I sort of know these fish by now. 27 A. That's correct. 28 and then, if we found that it was incorrect, we would have to, like, double-check it. 29 A. Nes. I sort of know these fish by now. 29 A. Nes. I sort of know these fish by now. 20 A. Wes and no. 4 Q. Okay. Bow does that work; which part is jeye and which part is no? 4 Q. Okay. Bow does that work; which part is jeye and which part is no? 4 Q. Okay. Bow does that work; which part is jeye and which part is no? 4 Q. Okay. Bow does that work; which part is inthis instance, with this research agreement. Wes 20 A. Nes. I should be to determine that the 13 information being provided back to the client was 20 genuine? 4. Nes. 25 MENTOTY Chjection, but go absad. 7 A. Yes. 29 Based on A you have to understand, if we're told 20 your name is John Smith, and we're given 20 based on - you have to understand, if we're told 21 your name is John Smith, and we're given 20 based on - you have to understand, if we're told 22 based on - you have to understand, if we're told 22 based on - you have to understand, if we're told 23 your name		provided by its sources?	1	· ·
the how to get them document?  A Yesh. It's cross-checking, it's making about with the how to get them document?  A Yesh. Te's cross-checking, it's making a birthday over there and you have a birthday over there. They should be the same birthday. If they're not, there's something that we need to look at on a secondary basis.  If you have a passport number over the read to have a different and the same hard have well have within the feat department, there's an issue. So we have to then go down that rabbit hole.  A Can defail a synthmais or an analysis process that Strategic Vision typically does with the information it gemnine?  A. That's correct.  Q. Did Strategic Vision thave an the information being provided was gemnine in this instance?  A Can A Yes and no.  A Ces And the same instance?  A New Strategic Vision have an the information being provided was gemnine in this instance?  A New Strategic Vision have an the information was correct.  A Conday. How does that work: which part is yes and then, if we found that it was incorrect, we would have to, like, double-check it.  A Yes.  C No. I'm asking about what happened in this instance, with this research agreement. Was Strategic Vision being provided back to the client was gemnine?  A Yes.  A Yes.  A Yes.  A Yes.  A Yes.  A Yes.  A Real Wes.  A Yes.  A Res.  Barrand whith part is mo?  A Res.  Barrand sold Strategic Vision bave an thing have to, like, double-check it.  A Yes.  Barrand sold Strategic Vision bave an thing year and then, if we found that it was incorrect, we would have to, like, double-check it.  A Yes.  Barrand sold Strategic Vision do that?  A Yes.  Barrand sold S		A. That's part of the idea that we had	2	and we find out really your name is Joe Schmidt,
5 the — how to get them document? 6 A. Yeah. It's across—checking, it's making 7 sure, double verifying the same fact. You have a 8 birthday over here and you have a birthday over 9 there. They should be the same birthday over 10 they're not, there's something that we need to 11 look at on a secondary basis. 12 If you have a passport number over 13 here, a U.S. passport, a U.S. visa number over 14 here, and it doesn't match what we have within 15 the state department. there's an issue. So we 16 have to then go down that rakbit hole. 17 O. And that's a synthesis or an analysis 18 process that Strategic Vision typically does with 19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 22 typically feels comfortable guarantesing that all 23 the information is gemine? 24 A. That's correct. 25 Q. Did Strategic Vision have an 26 A. Clay. Of course. Yes, we could verify 27 in many cases that the information was correct, 28 and then, if we found that it was incorrect, 29 and have to, like, double-check it. 20 Q. No. T'm asking about what happened in 21 this instance, with this its research agreement. Was 22 Strategic Vision able to determine that the 23 information being provided back to the client was 24 genuine? 25 A. Yes. 26 A. Yes. 27 A. Yes. 28 Strategic Vision able to determine that the 29 information being provided back to the client was 29 genuine? 20 A. That's course. 21 Q. No. T'm asking about what happened in 22 this information being provided back to the client was 23 genuine? 24 A. Yes. 25 Strategic Vision able to determine that the 26 information being provided back to the client was 27 genuine? 28 Strategic Vision able to determine that the 29 information being provided back to the client was 29 genuine? 20 A. Res. 21 A. Yes. 22 A. Ses and no. 23 A. Wesl. 24 A. Wesl. 25 Course. Yes, we could verify 26 A. Glay. Of course. Yes, we could verify 27 in many casee that the information was correct, 28 and make sure that these were turning over 29 A. Y		_	3	
That's why it was extremely not   sure, double verifying the same fact. You have a   birchday over here and you have a birthday over there, they should be the same birthday. If   10 they're not, there's something that we need to   10 report or Better Business Bureau thing. You just   10 look at on a secondary basis.   10 report or Better Business Bureau thing. You just   10 look at on a secondary basis.   10 report or Better Business Bureau thing. You just   10 look at on a secondary basis.   10 report or Better Business Bureau thing. You just   10 look at on a secondary basis.   10 report or Better Business Bureau thing. You just   10 look at on a secondary basis.   10 report or Better Business Bureau thing. You just   10 look at on a secondary basis.   10 report or Better Business Bureau thing. You just   10 look at on a secondary basis.   10 report or Better Business Bureau thing. You just   10 look at on a secondary basis.   10 report or Better Business Bureau thing. You just   10 look at on a secondary secondary   10 look at on a secondary   10 look at on a look at look a	4	Q. That's what you're talking about with	4	then we have to then rejig the entire system that
8 birthday over here and you have a birthday over there between they should be the same birthday. If 10 they're not, there's something that we need to 11 look at on a secondary basis. 11 couldn't. 12 If you have a passport number over 12 couldn't. 13 here, a U.S. passport, a U.S. visa number over 13 here, a U.S. passport, a U.S. visa number over 14 here, and it doesn't match what we have within 15 the state department, there's an issue. So we 16 have to then go down that rabbit hole. 17 Q. And that's a synthesis or an analysis process that Strategic Vision typically does with 19 the information it's getting from its sources? 19 A. No. 1 sort of know these fish by now. 18 the information is less granteeing that all 22 typically feels confortable guaranteeing that all 23 the information is genuine? 24 A. That's correct. 25 Q. Did Strategic Vision have an 26 A. Gray. Of course. Yes, we could verify 7 in many cases that the information being 2 provided was genuine in this instance? 3 A. Yes and no. 4 Q. Gkay. How does that work: which part 15 is yes and which part is no? 4 A. Okay. Of course. Yes, we could verify 7 in many cases that the information was correct, and then, if we found that it was incorrect, we would have to, like, double-check it. Q. No. 17 masking about what happened in this instance, with this research agreement. Was 12 Strategic Vision able to determine that the 3 information being provided back to the client was 9 semine? 4 A. Yes. 18 Q. How did Strategic Vision do that? A. Yes. 19 A. Because we compared apples and oranges 20 and made sure that they were one and the same, as 21 far as information that we were turning over 22 based on - you have to understand, if we're told 23 your name is John Smith, and we're given 27 in name as adman mande Rilsen Rodriguez, at the 23 some and made sure that they were one and the same, as 21 far as information that we were turning over 22 based on - you have to understand, if we're told 23 your name is John Smith, and we're given 27 in the same Accidence to the		•		-
8 birthday over here and you have a birthday over 9 there. They should be the same birthday. If 1 they're not, there's something that we need to 11 look at on a secondary basis. 12 If you have a passport number over 13 here, a U.S. passport, a U.S. visa number over 14 here, and it doesn't match what we have within 15 the state department, there's an issue. So we 16 have to then go down that rabbit hole. 17 Q. And that's a synthesis or an analysis 18 process that Strategic Vision typically does with 18 the information it's getting from its sources? 19 A. That's correct. 20 Y. I see. And that's how Strategic Vision 20 Y. I see. And that's how Strategic Vision 20 Y. I was going to say, so how many of the 19 the information is gemine? 21 A. That's correct. 22 You could take a look back at it if you want, but I don't think it's necessary. 22 You could take a look back at it if you want, but I don't think it's necessary. 23 A. Well, I can tell you, you can see some of the information is gemine? 24 A. That's correct. 25 Q. Did Strategic Vision have an 25 instance, on page 3, you have Anita. 26 fight want, but I don't think it's necessary. 27 You could take a look back at it if you want, but I don't think it's necessary. 28 A. Well, I can tell you, you can see some of my notes on here. Some of these for instance, on page 3, you have Anita. 29 Yo			6	
9 there. They should be the same birthday. If 10 they're not, there's something that we need to 11 look at on a secondary basis. 12 If you have a passport number over 13 here, a U.S. passport, a U.S. visa number over 14 here, and it doesn't match what we have within 15 the state department, there's an issue. So we 16 have to then 90 down that rabbit hole. 17 O. And that's a synthesis or an analysis 18 process that Strategic Vision typically does with 19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 22 typically feels confortable guaranteeing that all 23 the information is gemuine? 24 A. That's correct. 25 Q. Did Strategic Vision have an  Page 157 2 opportunity to verify that the information being 2 provided was gemuine in this instance? 3 A. Yes and no. 4 Q. Ckay. How does that work; which part 5 is yes and which part is no? 4 Q. Okay. How does that work; which part 5 is yes and which part is no? 6 A. Ckay. Of course. Yes, we could verify 9 in anny cases that the information was correct, 8 and then, if we found that it was incorrect, we 9 would have to, like, double-check it. 10 Q. No, I'm asking about what happened in 11 this instance, with this research agreement. Was 12 Strategic Vision able to determine that the 13 information being provided back to the client was 14 genuine? 15 A. Yes. 16 A. Well. Jour label, to want, but I don't think it's necessary. 17 Q. I was going to say, so how many of the 18 A. Well. I can tell you, you can see some 19 of my notes on here. Some of these for 20 instance, on page 3, you have Anita.  Page 157 2 A. Her real mother is Mingduan Yao. 2 A. Her real mother is Mingduan Yao, and then the father of the sister, 3 Mingduan Yao, and then the father of the sister, 4 Mingduan Yao, and then the father influenting). 4 Mingduan Yao, and then the father influenting). 5 Mingduan Yao, and then the father influenting). 6 Mingduan Yao, and then the father influenting). 7 Mingsham - Mingsham - Mingsham Yao. These are the				
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11 look at on a secondary basis. 12 If you have a passport number over 13 here, and it doesn't match what we have within 15 the state department, there's an issue. So we 16 have to then go down that rabbit hole. 17 Q. And that's a synthesis or an analysis 18 process that Strategic Vision typically does with 19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 22 typically feels comfortable guaranteeing that all 23 the information is gemuine? 24 A. That's correct. 25 Q. Did Strategic Vision have an 26 A. Wes and that's instance? 27 a. Yes and which part is no? 28 A. Wes a passport number over 29 A. Wes a passport number over 29 A. Wes a passport number over 29 Q. You could take a look back at it if you went, but I don't think it's necessary. 20 Q. I was going to say, so how many of the correct information for? 21 the information is gemuine? 22 A. Well, I can tell you, you can see some of my notes on here. Some of these for instance, on page 3, you have Anita. 29 Page 157 20 provided was genuine in this instance? 21 A. Yes. 22 A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then then this instance, with this research agreement. Was 14 Strategic Vision able to determine that the information being provided back to the client was gemuine? 23 A. Yes. 24 A. Yes. 25 Charlotte of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao, and then the father of the sister, Mingduan Yao	9	-	9	just do like you're checking somebody's credit
12 here, a U.S. passport, a U.S. visa number over 13 here, a U.S. passport, a U.S. visa number over 14 here, and it doesn't match what we have within 15 the state department, there's an issue. So we 16 have to then go down that rabbit hole. 17 Q. And that's a synthesis or an analysis 18 process that Strategic Vision typically does with 19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 22 the information is genuine? 23 the information is genuine? 24 A. That's correct. 25 Q. Did Strategic Vision have an 26 provided was genuine in this instance? 27 A. Yes and no. 28 Yes and no. 29 Q. Yes. 20 A. Well, I can tell you, you can see some of these—for instance, on page 3, you have Anita. 29 provided was genuine in this instance? 30 A. Yes and no. 41 Q. Gkay. How does that work; which part is sye sand which part is no? 42 A. Okay. Of course. Yes, we could verify in many cases that the information was correct, and then, if we found that it was incorrect, we would have to, like, double-check it. 31 G. Well, just going back to Wallop 7. 32 A. Wes. 33 A. Yes. 34 A. Yes. 35 A. Wes. 36 A. Yes. 37 A. Well, I can tell you, you can see some of my notes on here. Some of these—for instance, on page 3, you have Anita. 38 A. Wes real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then —then the —then other is wingshan Yao. These are the real parents of this girl, okay? But, in certain documentation, it's showing that these people are, in fact, her mother and father (indicating). 39 The if you go to here, if you go on to genuine? 40 A. Yes. 41 A. Yes. 42 A. Because we compared apples and oranges and made sure that they were one and the same, as far as information that we were turning over base as information that we were unring over base and reanges and made sure that they were one and the same, as far as information that we were turning over base and reanges and made sure that they were one and the same, as	10	they're not, there's something that we need to	10	report or Better Business Bureau thing. You just
13 here, a U.S. passport, a U.S. visa number over 14 here, and it doesn't match what we have within 15 the state department, there's an issue. So we 16 have to then go down that rabbit hole. 17 Q. And that's a synthesis or an analysis 18 process that Strategic Vision typically does with 19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 22 typically feels confortable guaranteeing that all 23 the information is gemuine? 24 A. That's correct. 25 Q. Did Strategic Vision have an 26 provided was genuine in this instance? 27 provided was genuine in this instance? 28 A. Yes and no. 29 provided was genuine in this instance? 30 A. Yes and no. 40 Q. Okay. How does that work; which part is syes and which part is no? 41 Q. Okay. How does that work; which part is seen and which part is no? 42 A. Okay. of course. Yes, we could verify in many cases that the information was correct, as and then, if we found that it was incorrect, we would have to, like, double-check it. 40 Q. No, I'm asking about what happened in this instance, with this research agreement. Was 18 genuine? 41 A. Yes. 42 A. Yes. 43 A. Wastever that is. 44 Q. You could take a look back at it if you want, but I don't think it's necessary. 44 A. No. I sort of know these fish by now. 45 Q. I was going to say, so how many of the fish were -was Strategic Vision provided with correct information for? 45 Q. Did Strategic Vision have an 46 G. Well, I can tell you, you can see some of my notes on here. Some of these for instance, on page 3, you have Anita. 47 Q. Ves. 48 A. Frark Suen, and then then the the mother sorry, the mother is Mingduan Yao, and then the father of the sister, 49 Would have to, like, double-check it. 40 Q. No, I'm asking about what happened in this instance, with this research agreement. Was 18 parents of this girl, okay? But, in certain occurrent in formation being provided back to the client was 19 parents of this girl, okay? But, in certain parents of this girl, okay? B	11	look at on a secondary basis.	11	
14 here, and it doesn't match what we have within 15 the state department, there's an issue. So we 16 have to then go down that rabbit hole. 17 Q. And that's a synthesis or an analysis 18 process that Strategic Vision typically does with 19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 22 typically feels comfortable guaranteeing that all 23 the information is genuine? 24 A. That's correct. 25 Q. Did Strategic Vision have an 26 Page 155 27 opportunity to verify that the information being 28 provided was genuine in this instance? 30 A. Yes. 31 A. Yes and no. 42 Q. Kay. How does that work: which part 43 is yes and which part is no? 44 Q. CKay. How does that work: which part 45 is yes and which part is no? 46 A. Okay. Of course. Yes, we could verify 47 in many cases that the information was correct, 48 and then, if we found that it was incorrect, we would have to, like, double-check it. 49 would have to, like, double-check it. 40 Q. No, I'm asking about what happened in 41 this instance, with this research agreement. Was 42 Strategic Vision able to determine that the information being provided back to the client was 43 Great and made sure that they were one and the same, as 44 Yes. 45 MR. SCHMIDT: Objection, but go ahead. 46 A. Yes. 47 Yes. 48 Page 157 49 A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then then the mother story, the mother is 49 would have to, like, double-check it. 40 Q. No, I'm asking about what happened in this instance, with this research agreement. Was information being provided back to the client was 40 genuine? 41 A. Yes. 42 A. Her real mother is Mingduan Yao. Her adoptive parents, because that 's done a lot in this basket, are Frank Suen, and then then the mother story, the mother is 40 A. Her real mother is Mingduan Yao? 41 A. Her real mother is Mingduan Yao? 42 A. Her real mother is Mingduan Yao? 43 A. Her real mother is Mingduan Yao? 44	12	If you have a passport number over	12	Q. Well, just going back to Wallop 7.
the state department, there's an issue. So we labave to then go down that rabbit hole.  Q. And that's a synthesis or an analysis lab process that Strategic Vision typically does with the information it's getting from its sources?  A. That's correct.  Q. I see. And that's how Strategic Vision 2t typically feels comfortable guaranteeing that all typically feels comfortable guaranteeing that all the information is genuine?  A. That's correct.  Q. Did Strategic Vision have an  Page 155  opportunity to verify that the information being provided was genuine in this instance?  A. Yes and no.  Q. Okay. How does that work; which part is so?  A. Okay. Of course. Yes, we could verify in many cases that the information was correct, and then, if we found that it was incorrect, we would have to, like, double-check it.  Q. No, I'm asking about what happened in this instance, with this research agreement. Was genuine?  A. Yes.  Mr. SCIMIDT: Objection, but go ahead.  A. Yes.  A. Pas.  O, How did Strategic Vision do that?  A. Because we compared apples and oranges and made sure that they were one and the same, as far as information that we were turning over based on you have to understand, if we're told 2y pur name is John Smith, and we're given  The if you could take a look back at it if you want, but I don't think it's necessary.  A. No. I sort of know these fish by now.  Q. I was going to say, so how many of the correct information for?  A. Well, I can tell you, you can see some of my notes on here. Some of these for instance, on page 3, you have Anita.  Page 155  Q. Yes.  A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then then the then other sorry, the mother is many cases that the information back in the information the parents of this girl, okay? But, in certain documentation, it's showing that these people are, in fact, her mother and father (indicating). They're not. They're her adopt adoptive parents.  Then if you go to here, if	13	here, a U.S. passport, a U.S. visa number over	13	A. Whatever that is.
16 have to then go down that rabbit hole. 17 Q. And that's a synthesis or an analysis 18 process that Strategic Vision typically does with 19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision at typically feels confortable guaranteeing that all the information is genuine? 22 A. That's correct. 23 A. That's correct. 24 A. That's correct. 25 Q. Did Strategic Vision have an 26 Page 155 27 opportunity to verify that the information being provided was genuine in this instance? 28 A. Yes and no. 29 Q. Kay. How does that work; which part is syes and which part is no? 29 A. Okay. Of course. Yes, we could verify in many cases that the information was correct, and then, if we found that it was incorrect, we would have to, like, double-check it. 29 Q. No, I'm asking about what happened in this instance, with this research agreement. Was 12 Strategic Vision able to determine that the 13 information being provided back to the client was 14 genuine? 20 A. Yes. 21 A. Well, I can tell you, you can see some of my notes on here. Some of these for instance, on page 3, you have Anita. 22 A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then the father of the sister, Mingshan Yao. These are the real parents of this girl, okay? But, in certain documentation, it's showing that these people are, in fact, her mother and father (indicating). They're her adopt adoptive parents. 28 Then if you go to here, if you go n to recrectly, and this is only on recall was far a woman named Eileen Rodriguez, at the your name is John Smith, and we're given 20 the same address where this woman Anita was living.	14	here, and it doesn't match what we have within	14	Q. You're saying that that's the list
Q. You could take a look back at it if you process that Strategic Vision typically does with the information it's getting from its sources? A. That's correct. Q. I see. And that's how Strategic Vision typically feels confortable guaranteeing that all the information is genuine? A. That's correct. Q. Did Strategic Vision have an  Page 155 Opportunity to verify that the information being provided was genuine in this instance? A. Yes and no. A. Ckay. Go course. Yes, we could verify in many cases that the information was correct, and then, if we found that it was incorrect, we would have to, like, double-check it. C. No, I' masking about what happened in this instance, with this research agreement. Was genuine? A. Yes. C. No, I' masking about what happened in information being provided back at it if you want, but I don't think it's necessary. A. No. I sort of know these fish by now. A. Well, I can tell you, you can see some for my notes on here. Some of these — for instance, on page 3, you have Anita.  Page 157  Q. Yes. A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then — then the — then other — sorry, the mother is Mingduan Yao. These are the real A parents of this girl, okay?	15	- · · · · · · · · · · · · · · · · · · ·	15	of fish?
18 process that Strategic Vision typically does with 19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 22 typically feels comfortable guaranteeing that all 23 the information is genuine? 24 A. That's correct. 25 Q. Did Strategic Vision have an 26 provided was genuine in this instance? 27 provided was genuine in this instance? 28 A. Yes and no. 4 Q. Okay. How does that work; which part 4 is yes and which part is no? 5 A. Okay. Of course. Yes, we could verify 7 in many cases that the information was correct, 8 and then, if we found that it was incorrect, we 9 would have to, like, double-check it. 10 Q. No, I'm asking about what happened in 11 this instance, with this research agreement. Was 12 Strategic Vision able to determine that the 13 information being provided back to the client was 14 genuine? 15 A. Yes. 16 MR. SCHMIDT: Objection, but go ahead. 17 A. Wes. 18 Q. How did Strategic Vision do that? 19 A. Because we compared apples and oranges 20 and made sure that they were one and the same, as 21 far as information that we were turning over 22 based on you have to understand, if we're told 23 A. Well, I can tell you, you can see some 24 of my notes on here. Some of these for 25 instance, on page 3, you have Anita.  Page 157  Q. Yes.  Q. Yes.  Page 157  Q. Yes.  A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in 4 this basket, are Frank Suen, and then then 5 the the mother sorry, the mother is 6 Mingduan Yao, and then the father of the sister, 7 Mingshan Mingshan Yao. These are the real 8 parents of this gerill, okay? But, in certain 9 documentation, it's showing that these people 9 are, in fact, her mother and father (indicating). 11 this instance, on page 4, and it shows 1990 as her, I guess, entry, 12 because I don't have the note on here; 1990 is 14 her maybe her entry into the United States 16 her maybe her entry into the United States 17 visa. The Social Security number, if I rec	16	have to then go down that rabbit hole.	16	A. Yes.
19 the information it's getting from its sources? 20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 21 typically feels comfortable guaranteeing that all 22 the information is genuine? 22 A. That's correct. 23 A. Well, I can tell you, you can see some 24 A. That's correct 25 Q. Did Strategic Vision have an  Page 155 opportunity to verify that the information being 2 provided was genuine in this instance? 3 A. Yes and no. 4 Q. Okay. How does that work; which part is is yes and which part is no? 6 A. Okay. Of course. Yes, we could verify 7 in many cases that the information was correct, 8 and then, if we found that it was incorrect, we 9 would have to, like, double-check it. 10 Q. No, I'm asking about what happened in 11 this instance, with this research agreement. Was 12 Strategic Vision able to determine that the information being provided back to the client was 14 genuine?  A. Yes. 10 R. SCHMIDT: Objection, but go ahead. 11 A. Yes. 21 A. No. I sort of know these fish by now. 20 Q. I was going to say, so how many of the fish where—was Strategic Vision provided with correct information for? 23 A. Well, I can tell you, you can see some of these—for instance, on page 3, you have Anita.  Page 157 Q. Yes. 2 A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then—then the theorem. Then the parents of this girl, okay? But, in certain documentation, it's showing that these people are, in fact, her mother and father (indicating). They're not. They're her adopt — adoptive parents. 2 Strategic Vision able to determine that the information being provided back to the client was 13 Then if you go to here, if you go on to 14 page 4, and it shows 1990 as her, I guess, entry, because I don't have the note on here: 1990 is her—may be her entry into the United States 17 visa. The Social Security number, if I recall correctly, and this is only on recall — Q. Sure. 24 A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a l				-
20 A. That's correct. 21 Q. I see. And that's how Strategic Vision 22 typically feels comfortable guaranteeing that all 23 the information is genuine? 23 the information is genuine? 24 A. That's correct. 25 Q. Did Strategic Vision have an  Page 155 1 opportunity to verify that the information being 2 provided was genuine in this instance? 3 A. Yes and no. 4 Q. Okay. How does that work; which part is is yes and which part is no? 6 A. Okay. Of course. Yes, we could verify in many cases that the information was correct, 8 and then, if we found that it was incorrect, we 9 would have to, like, double-check it. 10 Q. No, I'm asking about what happened in 11 this instance, with this research agreement. Was 2 Strategic Vision able to determine that the information being provided back to the client was 2 Strategic Vision do that? A. Yes. 16 MR. SCHMIDT: Objection, but go ahead. 17 A. Yes. 18 Q. How did Strategic Vision do that? A. Yes. 20 Q. I was going to say, so how many of the fish were was Strategic Vision provided with correct information for? 22 correct information for? 23 A. Well, I can tell you, you can see some of these for instance, on page 3, you have Anita.  Page 157 Q. Yes. 2 A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then then the the mother sorry, the mother is Mingduan Yao. These are the real parents of this girl, okay? But, in certain documentation, it's showing that these people are, in fact, her mother and father (indicating). They're net. They're her adopt adoptive parents.  13 Then if you go to here, if you go on to page 4, and it shows 1990 as her, I guess, entry, because I don't have the note on here? 1990 is her maybe her entry into the United States visa. The Social Security number, if I recall correctly, and this is only on recall Q. Sure.  14 A. — was, in fact here we go, on page 5, it shows it, had the same Social Security number as a woman named Eileen Rodriguez, at the same address where				want, but I don't think it's necessary.
Q. I see. And that's how Strategic Vision the information is genuine?  A. That's correct. Q. Did Strategic Vision have an  Page 155 opportunity to verify that the information being provided was genuine in this instance? A. Yes and no. Q. Okay. How does that work; which part is yes and which part is no? A. Okay. Of course. Yes, we could verify in many cases that the information was correct, and then, if we found that it was incorrect, we would have to, like, double-check it. Q. No, I'm asking about what happened in this instance, with this research agreement. Was Strategic Vision able to determine that the information being provided back to the client was genuine?  A. Yes.  Q. How did Strategic Vision do that? A. Yes. A. Well, I can tell you, you can see some of my notes on here. Some of these for instance, on page 3, you have Anita.  Page 157 Q. Yes. A. Her real mother is Mingduan Yao. Her adoptive parents, because that's done a lot in this basket, are Frank Suen, and then then other sorry, the mother is the backet, are Frank Suen, and then then other sorry, the mother is Mingduan Yao, and then the father of the sister, Mingshan Mingshan Yao. These are the real parents of this girl, okay? But, in certain documentation, it's showing that these people are, in fact, her mother and father (indicating). They're not. They're her adopt adoptive parents.  Then if you go to here, if you go on to page 4, and it shows 1990 as her, I guess, entry, because I don't have the note on here; 1990 is her maybe her entry into the United States visa. The Social Security number, if I recall correctly, and this is only on recall Q. Sure.  A was, in fact here we go, on page 157 D. Sure. A. Her real mother is Mingduan Yao. Her the mother sorry, the mother is Mingduan Yao. Her the mother sorry, the mother is Mingduan Yao. The because I dat's done a lot in this basket, are Frank Stene and the in this basket, are Frank Stene and the in this basket, are Frank Stene and the in this basket, are Frank S	19	the information it's getting from its sources?		-
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19 A. Because we compared apples and oranges 20 and made sure that they were one and the same, as 21 far as information that we were turning over 22 based on you have to understand, if we're told 23 your name is John Smith, and we're given  19 Q. Sure. 20 A was, in fact here we go, on page 21 5, it shows it, had the same Social Security 22 number as a woman named Eileen Rodriguez, at the 23 same address where this woman Anita was living.				
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22 based on you have to understand, if we're told 22 number as a woman named Eileen Rodriguez, at the 23 your name is John Smith, and we're given 23 same address where this woman Anita was living.				, , , , , , , , , , , , , , , , , , , ,
23 your name is John Smith, and we're given 23 same address where this woman Anita was living.		_		
24 information on these documents from Guo that your   24 So then again, this is just one tidbit				
25 name is John Smith with a photograph and all of 25 of one figh or one person that you have to start	1 24	information on these documents from Guo that your	24	So then again, this is just one tidbit

25 name is John Smith, with a photograph and all of 25 of one fish, or one person that you have to start

	Trenen wanop		
1	Page 158 tracking, and you have to understand where the	1	Page 160 of whack, like numbers, passport numbers or visa
2	pieces fit, or why.	2	numbers, or this one has an Australian
3	Q. And so just	3	nationality, some of the ones that we were doing
4	A. If you go yeah.	4	in the U.K. had totally different names, but then
5	Q. On that fifth page, those are your	5	they actually did match up if you dug deeper.
6	notes about	6	Q. Okay. So some of them had you had
7	A. Yes.	7	mentioned earlier had were completely fake,
8	Q Eileen Rodriquez?	8	they weren't
9	A. Yes.	9	A. That's right.
10	Q. And what does	10	Q real people?
11	A. It's the same Social Security number.	11	A. That's right.
12	Q. And what's the money down there? It	12	Q. How many of the 15 fish were, in
13	looks like it says 2,000 and	13	Strategic Vision's opinion or knowledge, fake?
14	A. No, no. It's 2 million. 2.089.000.	14	A. I would have to talk to Mike about
15	That, I believe, was the address where she was	15	that, but I think we we came up with at least
	living, and it showed, if I recall correctly,		
16		16	five or six that were fake, or at least had a lot
17	again, I can't remember because I don't have it	17	of questions to be asked about them. The names
18	all in front of me, but she had sort of a credit	18	did not match up with the names on the state
19	limit of \$2,000 on a credit card, the only credit	19	department visas or on within our channels.
20	card she had, and then the house that she was	20	Q. In other words, there obviously was a
21	living in somehow was bought in cash, but it	21	person who looked like that fish in the
22	doesn't show who the owners were of that	22	A. That's right.
23	residence.	23	Q document?
24	And then you get all these you must	24	A. Yes.
25	have had four or five Social Security numbers	25	Q. But that the names and information
	Page 159		Page 161
1	that were the same Social Security numbers for	1	being provided were for
1 2	that were the same Social Security numbers for the same person.	1 2	
	that were the same Social Security numbers for		being provided were for  A. Were fake.  Q. Were fake?
2	that were the same Social Security numbers for the same person.	2	being provided were for A. Were fake.
2 3	that were the same Social Security numbers for the same person.  Q. So just going back to my original	2 3	being provided were for  A. Were fake.  Q. Were fake?
2 3 4	that were the same Social Security numbers for the same person.  Q. So just going back to my original question, if you recall, how many of the	2 3 4	being provided were for  A. Were fake.  Q. Were fake?  A. If if Guo was telling the truth
2 3 4 5	that were the same Social Security numbers for the same person.  Q. So just going back to my original question, if you recall, how many of the information about the well, strike that.	2 3 4 5	being provided were for  A. Were fake.  Q. Were fake?  A. If if Guo was telling the truth about saying he paid \$250 million for this
2 3 4 5 6	that were the same Social Security numbers for the same person.  Q. So just going back to my original question, if you recall, how many of the information about the well, strike that.  A. There were a lot. There were at least	2 3 4 5 6	Deing provided were for  A. Were fake.  Q. Were fake?  A. If if Guo was telling the truth about saying he paid \$250 million for this information, then he totally got, excuse me,
2 3 4 5 6 7	that were the same Social Security numbers for the same person.  Q. So just going back to my original question, if you recall, how many of the information about the well, strike that.  A. There were a lot. There were at least three or four.	2 3 4 5 6 7	being provided were for  A. Were fake.  Q. Were fake?  A. If if Guo was telling the truth about saying he paid \$250 million for this information, then he totally got, excuse me, screwed. He got totally screwed. Because the
2 3 4 5 6 7 8	that were the same Social Security numbers for the same person.  Q. So just going back to my original question, if you recall, how many of the information about the well, strike that.  A. There were a lot. There were at least three or four.  Q. There were 15 fish, right?	2 3 4 5 6 7 8	being provided were for  A. Were fake.  Q. Were fake?  A. If if Guo was telling the truth about saying he paid \$250 million for this information, then he totally got, excuse me, screwed. He got totally screwed. Because the information in here, just from what we were able
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2 3 4 5 6 7 8 9 10 11	that were the same Social Security numbers for the same person.  Q. So just going back to my original question, if you recall, how many of the information about the well, strike that.  A. There were a lot. There were at least three or four.  Q. There were 15 fish, right?  MR. SCHMIDT: Let him finish the question.  Q. Yeah, let me just finish the question. Thanks.	2 3 4 5 6 7 8 9 10 11 12	Deing provided were for  A. Were fake.  Q. Were fake?  A. If if Guo was telling the truth about saying he paid \$250 million for this information, then he totally got, excuse me, screwed. He got totally screwed. Because the information in here, just from what we were able to surmise, was rubbish, and that's real the real garbage.  Q. Okay. Let's go back to the research agreement, that's Wallop 9.
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	French Wallop	OII	J2/12/2017
1	Page 162 A. Yes.	1	Page 164 unavailable for a time; is that fair to say?
2	Q. Did you and Mr. Waller draft this	2	A. Which Guo understood completely. At
3	section?	3	least he said he did.
4	A. Dr. Waller, yes, we did.	4	Q. When did he tell you that?
5	Q. And what was the intent or purpose	5	A. Several times. I think it was probably
6	behind drafting this section?	6	the middle of January when we met him, and then
7	A. I wouldn't call it intent. That's	7	on the 26th, even though he was upset we didn't
8	that's truly not fair. It was a protective	8	have everything by Chinese New Year, or some kind
9	element for life. You can't always say that it's	9	of new criteria.
10	going to be 100 percent of everything every	10	Q. Did you understand that the research
11	second of every day. You cannot. It's not	11	was needed in a very tight schedule because of
12	there, it's not gonna happen.	12	the Chinese New Year?
13	So irregular circumstances by us, and	13	A. No.
14	including Guo, said that both parties understand	14	Q. When did you come to understand that?
15	that occasional unforeseen challenges may arise	15	A. Later, when we realized that that
16	that will slow or block comprehensive research,	16	seemed to be his issue.
17	and that there may be periods in which	17	Q. When did you first talk about getting
18	information is irregular, unavailable or	18	the information by Chinese New Year with Mr. Guo
19	incomplete.	19	or Yvette Wang
20	Perfect reference are some of these	20	A. Never.
21	names in here. The contractor will endeavor to	21	Q or Lianchao?
22	make all research and reports as complete as	22	A. Never. Not until much later, I mean,
23	possible in a timely scheduled manner. Which	23	after the fact.
24	does not mean ten days from the beginning of the	24	Q. No, that's what I'm trying to find out
25	contract.	25	when
	D 1/2		
	Page 103		Page 165
1	Page 163 Q. Has Strategic Vision ever used a clause	1	Page 165 A. Oh.
1 2	E	1 2	•
	Q. Has Strategic Vision ever used a clause		A. Oh.
2	Q. Has Strategic Vision ever used a clause that's substantially the same or similar to this	2	A. Oh. Q. When that was.
2 3	Q. Has Strategic Vision ever used a clause that's substantially the same or similar to this irregular circumstances clause in other	2 3	A. Oh. Q. When that was. A. After the fact, so sometime in the
2 3 4	Q. Has Strategic Vision ever used a clause that's substantially the same or similar to this irregular circumstances clause in other agreements?	2 3 4	A. Oh. Q. When that was. A. After the fact, so sometime in the early part of February, I guess. I think maybe
2 3 4 5	Q. Has Strategic Vision ever used a clause that's substantially the same or similar to this irregular circumstances clause in other agreements?  A. I'm sure there have been ones that have	2 3 4 5	A. Oh. Q. When that was. A. After the fact, so sometime in the early part of February, I guess. I think maybe Lianchao sort of said that to us.
2 3 4 5 6 7 8	Q. Has Strategic Vision ever used a clause that's substantially the same or similar to this irregular circumstances clause in other agreements?  A. I'm sure there have been ones that have been similar to it. I mean, it's not unusual.  This is this is the form that is taken.  Q. In terms of Strategic Vision's	2 3 4 5 6	A. Oh. Q. When that was. A. After the fact, so sometime in the early part of February, I guess. I think maybe Lianchao sort of said that to us. Q. Okay. But prior to the contract, there was no discussion about A. No.
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3 time-based, essentially, is there amy period   4 where irregular circumscances would result in a   5 pause of the client's obligation to make payment?   5 to py the contractor? It's in the   7 answered, but go ahead.   8 A. I'd like to ask any law firm. Give me   9 a break.   8 A. I'd like to ask any law firm. Give me   9 a break.   10 Q. Well, I'm asking you the question, but I'm   10 telling you it's just like a law firm we   14 operate in the same way.   15 Ke. SCHROIT: That's the answer. You   16 got your answer.   17 Me. SCHROIT: That's the answer. You   18 Q. So, in your mind, or in Strategic   19 Q. Well, i'm compensated for the   11 time it spends trying to do research, not based   20 quon what's actually delivered?   12 Me. SCHROIT: Chejection.   24 A. Yee.   25 Q. What's the cost of a report under this   25 Q. Well, you have it here. It's listed.   26 Q. Well, you have it here. It's listed.   27 payment   28 door.   28 door.   28 door.   28 door.   29 Me. SCHROIT: There's a knocking on the door.   29 Me. SCHROIT: There's a knocking on the door.   20 Me. GENROIT: Enter see of that's lit.   21 the world of the second at 14 door.   22 Me. GENROIT: There's a knocking on the door.   28 Me. GENROIT: There's a knocking on the door.   29 Me. GENROIT: Enter see of that's lit.   20 Me. GENROIT: Enter see of that's lit.   21 Me. GENROIT: There's a knocking on the door.   20 Me. GENROIT: Enter see of the stress of the surgeround the safety of our -our contractors or our teems.   20 Me. GENROIT: Enter see of the stress of the surgeround the safety of our -our contractors or our teems.   20 Me. GENROIT: Enter see of the surgeround the safety of our -our contractors or our teems.   20 Me. GENROIT: There's a knocking on the world at 21 me.   21 Me. GENROIT: There's a knocking on the door.   21 Me. GENROIT: There's a knocking on the door.   22 Me. GENROIT: There's a knocking on the door.   23 Me. GENROIT: There's a knocking on the door.   24 Me. GENROIT: There's a knocking on the door.   25 Me. GENROIT: There'				
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7 A. Yes. 8 A. I'd like to ask any law firm. Give me a break. 9 a break. 10 Q. Well. I'm asking you the question, but I'm though, so, please. 11 though, so, please. 12 A. Well. you can ask the question, but I'm the same way. 13 telling you, it's just like a law firm, we operate in the same way. 14 operate in the same way. 15 MR. SCHRIDT: That's the answer. You got your answer. 16 you have seen the same way. 17 MR. GRENDI: I'm gonns just clean it up. Thank you. 18 W. SCHRIDT: That's the answer. You is the apreament; what was the meaning of it? 18 Up. Thank you. 19 Q. So, in your mind, or in Strategie time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research, not based time it spends trying to do research not based time it spends trying to do research, not based time it spends trying to do research. Not based time it spends trying to do research not based time it spends trying to do research. Not based time it spends trying to do research not based time i	6		6	to pay the contractor"? It's in the
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15 MR. SCHMIDT: That's the answer. You go your answer. 16 got your answer. 17 MR. GRENDI: I'm gonna just clean it 17 the U.K. or Europe, and we had told them 18 up. Thank you. 19 Q. So, in your mind, or in Strategic 19 cra Asian account; and guess what, it did, and 20 thior is actually delivered? 20 upon what's actually delivered? 21 intelligence services then finding out who Guo 22 upon what's actually delivered? 22 a. A. Well, you have it here. It's listed. 3 It's complex, depending upon the menu that he 4 chose to work with. 5 Q. Are you looking on page well, 6 Eastern 8? 6 W. SCHMIDT: There's a knocking on the 8 door. MR. GRENDI: Let me see if that's it. 11 We'll go off, I think it's about time. The VIDEOGRAPHER: Off the record at 15 taken.) 17 dat 2:30. Q. Good afternoon. Ms. Wallop, you still 18 my In the Mark and that you're under oath? 20 Q. I think it's right in front of you. 24 the investigation that we would be doing, and if	14		14	A. Because we had told him that, and they
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20 Vision's understanding, it's compensated for the 21 time it spends trying to do research, not based 22 upon what's actually delivered? 23 MR. SCHMIDT: Objection. 24 A. Yes. 25 Q. What's the cost of a report under this 26 Page 167 27 research agreement? 28 A. Well, you have it here. It's listed. 39 It's complex, depending upon the menu that he 4 chose to work with. 5 Q. Are you looking on page well, 6 Eastern 8? 6 Astern 8? 7 MR. SCHMIDT: There's a knocking on the 8 door. 9 THE WITNESS: Saved by your knock. 10 MR. GERDI: Let me see if that's it. 11 We'll go off. I think it's about time. 12 THE VIDEOGRAPHER: Off the record at 13 1:42. 14 (Whereupon a luncheon recess was 15 taken.) 16 THE VIDEOGRAPHER: Back on the record 17 at 2:30. 18 Q. Good afternoon. Ms. Wallop, you still 19 understand that you're under oath? 20 A. Just a second. 21 think it's right in front of you. 22 that was because of the mainland Chinese 11 intelligence services then finding out who Guo 12 and his people in Hong Kong were paying for this 12 kind of for a contract, let's just put it that 24 way. 25 Q. So was the purpose of this clause to 26 vine 1 hong Kong were paying for this 27 kind of for a contract, let's just put it that 28 wind of for a contract, let's just put it that 29 way. 20 So was the purpose of this clause to 21 vide out our contractors or our teams. 3 A. Yes, for our safety and the safety of 4 our our contractors or our teams. 4 our our contractors or our teams. 5 Q. Was it ever contemplated that the money 6 would come to an entity other than Strategic 7 Vision, to protect Strategic Vision's identity? 8 A. Yes. It was supposed to come from a 9 U.K. account to our account, from from him, 16 from Guo, through his money manager in the U.K., 17 as we understood it. 18 prime it we outh ever outher out a greed to the contract, as it's an agreement. 19 A. Mike and I both raised it. 19 Q. And how did that issue come up; did you 19 A. Mike and I both raised it. 19 Q. Okay. And what was just the substance 19	19		19	
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	French wanop		02/12/2017
1	Page 170	1	Page 172
1	hierarchy and their families was disclosed as a	1	Q. Was that on January 6th, the day it was
2	result of the funding that he was doing to us	2	signed?
3	directly.	3	A. I think so.
4	Q. Did you ever consider, on the recipient	4	Q. And how did that come up?
5	side, using another entity to receive the money,	5	A. Yvette said that was who was going to
6	other than Strategic Vision?	6	be signing it.
7	A. No. The agreement was with Strategic	7	Q. What did you say in response to that,
8	Vision. We had no idea who Eastern was.	8	if anything?
9	Q. Let me ask you about the next sentence	9	A. I asked her, I said, who's Eastern
10	there. It says, "all client payments must be	10	Profit? She said, Mr. Guo's company, or some
11	received by the contractor by wire transfer	11	such thing.
12	within five business days of invoice," do you see	12	Q. Then you checked where Eastern Profit
13	that?	13	Corporation Limited was incorporated?
14	A. Yes. Somewhere.	14	A. If I recall, when we were in the
15	Q. It's the last sentence in that	15	federal court, you didn't know where
16	paragraph.	16	Q. I'm asking you a question.
17	A. Yes.	17	A. No, I'm
18	Q. Did Strategic Vision issue any invoices	18	MR. SCHMIDT: Just answer
19	to Eastern?	19	A. I'm trying to answer it. I don't know
20	A. We were no.	20	because I couldn't find anything; when we went to
21	Q. So there was never a time when	21	sort of look it up, there wasn't anything that we
22	Strategic Vision sent an invoice document saying	22	could find in this country.
23	you owe this money to us, to Strategic or to	23	Q. What I'm asking is, did you look up
24	Eastern Profit, excuse me?	24	Eastern Profit Corporation Limited on January 6,
25	A. That's when Lianchao was involved, and	25	2018, did you try to figure out where it was from
	D 171		D 172
1	Page 171 he explicitly told Guo that he did owe the	1	Page 173 then?
	amount. We never got paid for January, we never		
2	allouite. We lievel got paid for balluary, we lievel	2	A. No.
3		2	
	got paid for February. We had the agreement,		Q. Did you know it was domiciled in China?
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Page 174 Page 176 1 It was supposed to be funded. 1 to Strategic Vision? 2 2 entire contract was supposed to be funded. None, other than a friend who kindly 3 Apparently, it wasn't. 3 was trying to see if there was something the 4 Let's go back to Exhibit 7. I think 4 matter with the flash drives, which clearly there previously you had mentioned that you saw this 5 were. So then I came to New York on Monday to 6 Exhibit 7 when Mr. Guo put it on a table at a 6 meet her, that is Yvette, at the Pierre, in the 7 meeting, is that right? lobby. I brought another computer. She brought 8 Α. I believe this is correct. 8 three flash drives. One worked, and that was 9 And when was the next time you saw this 9 this, this one; in other words, this file. The 10 information? 10 other two were corrupted. 11 Α. When we actually printed it off from 11 I kept them, kept all of the flash 12 the USB key. After three different attempts of 12 drives. I took the one that was good, I brought 13 corrupted USB keys from Yvette, we finally were 13 it back to Washington and put it into a virgin 14 able to print it off ourselves onto a virgin 14 computer, and then we printed this thing off. A 15 computer. 15 virgin computer, for the benefit of the court, is 16 Ο. Okay. When did -- when was the first 16 one that has no connection to the internet and/or 17 time you saw this information after the coffee 17 a printer that has any connection to an internet. 18 table viewing? 18 So it's like a dumb computer. 19 Α. When we printed it off after we got the 19 Does Strategic Vision have any kind of corrupted USB keys from Yvette. 20 confidentiality arrangement with Richard Shewell? 20 21 Q. What date was that? 21 Α. 22 MR. SCHMIDT: What date? 22 0. Is Richard Shewell a member of the team 23 23 Oh, I'm sorry. I guess it was about or otherwise -the -- oh, God, about the -- oh, the 8th, the 8th 24 25 of January it would have been. It would have 25 0. Let me just finish the question for the Page 175 Page 177 been Monday, because I had to come up to New York record. Is Richard Shewell part of Strategic 1 2 to get it. 2 Vision's team or teams that provide investigatory 3 3 research? Q. So you didn't see the information in Exhibit 7 on January 6, 2018 when it was -- the 4 4 Α. No. 5 contract was signed? 5 Ο. So once you've accessed this 6 Α. 6 information on January 8th, what did Strategic 7 7 You didn't view it? Vision do next? I -- it wouldn't open, that was the A. 8 Α. 8 On January 8th? 9 9 problem. That's why I had to come to New York. Q. Yes. Now that you have the list of 10 10 On the 6th, she gave us three keys, three USB fish. 11 keys. Two would not open. The third one would 11 So now that we've printed off this 12 not open on my computer, and so that's when I 12 file, then Mike came and we sat down and we 13 took it to my neighbor and he was kind enough to 13 started talking about how we were going to --14 put it into his computer, just to see if anything where we could -- which certain things we could 14 15 would open. All it was was complete corrupted 15 put together and enter into our channels for 16 file, just nothing but Chinese characters all 16 information. And then we -- then he got in touch over the place. It had no -- nothing like this. 17 17 with Team 1, that had been sort of sitting on 18 So we both starting pulling all of the wires out 18 hold, and then -- then there were meetings with 19 of his computers and his hard drives and -- yeah, 19 Team 1 leader, and we began. 20 and yanked the flash drive out and everything 20 So just this initial process with 21 else. It was a nightmare. 21 Dr. Waller, were you parsing to see who was going 22 Q. And who's your neighbor? 22 to do what in terms of the investigation, is that 23 You have the letter. His name is 23 fair? Α. Richard Shewell, S-h-e-w-e-l-l. 24 Α. Somewhat, yes. It's a very complex 25 And What's Mr. Shewell's relationship 25 investigation. It takes the U.S. side as well as

	French Wallop	, OII (	02/12/2017
1	Page 178 international side. We had to divide up the	1	Page 180 Q. Of course not. Right.
2	issues.	2	A. I want the court to be have a very
3	Q. Were there aspects of the research that	3	clear reading of what is being asked.
4	he was going to handle and aspects that you were	4	Q. Me, too.
5	going to handle, or Strategic Vision was going to	5	A. Good.
6	handle?	6	Q. And so then how did you were you
7	A. I would say so, yes.	7	managing the U.Sbased process personally?
8	Q. And what portion of the research was	8	A. Yes. Um-hum.
9	assigned or delegated to Strategic Vision, or you	9	Q. So you've got the information on
10	personally?	10	January 8th. What did you do in terms of that
11	A. The U.S. side, where we felt that we	11	process? What was
12	could pull certain pieces of information legally	12	A. Mike and I, as I said, divided up what
13	from U.S. channels, so we had to go through and	13	needed to be done. I got in touch with my
14	see who supposedly had a U.S. passport, U.S.	14	channels, he got in touch with his channels.
15	visas, or who had, you know, illegitimate	15	Q. Just without even saying who your
16	children born in the United States. It was a	16	channels are or what they do, did you get in
17	it was big. It was a big issue.	17	touch with several people; how many people did
18	Q. And what portion I take it Mr.	18	you get in touch with?
19	Waller was going to do the international portion?	19	A. I have no idea. There were a number of
20	A. No, Dr. Waller.	20	people.
21	Q. I'm sorry. I was calling him Mr.	21	Q. And did you receive valuable
22	Waller the whole last deposition, so correct me,	22	information from those people?
23	please, feel free. Dr. Waller.	23	A. Some, I did and some was was fake
24	What was Dr. Waller assigned to in	24	information. You have to understand that we were
25	terms of this division?	25	given fake names and fake information to either
	Page 179		Page 181
1 1	A. He was assigned to work with Team 1 to	1 1	good us down rabbit balos for nothing a waste of
1	ii. He wab abbighed to work with real real re-	1	send us down rabbit holes for nothing, a waste of
2	help pull the information with Team 1, because	2	time, or we could find legitimately that there
	help pull the information with Team 1, because there were a number of things that they had to		time, or we could find legitimately that there were some people that we could actually piece
2	help pull the information with Team 1, because	2	time, or we could find legitimately that there were some people that we could actually piece together some of the tracking. But their names
2 3 4 5	help pull the information with Team 1, because there were a number of things that they had to	2 3	time, or we could find legitimately that there were some people that we could actually piece
2 3 4 5 6	help pull the information with Team 1, because there were a number of things that they had to get into, but they could only do it from an overseas location.  Q. I see. So none of the U.Sbased	2 3 4 5 6	time, or we could find legitimately that there were some people that we could actually piece together some of the tracking. But their names had been changed. They kept changing their names.
2 3 4 5 6 7	help pull the information with Team 1, because there were a number of things that they had to get into, but they could only do it from an overseas location.  Q. I see. So none of the U.Sbased investigatory research was handled by Team 1?	2 3 4 5 6 7	time, or we could find legitimately that there were some people that we could actually piece together some of the tracking. But their names had been changed. They kept changing their names.  Q. So when did you when did you first
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	<b>^</b>		02/12/2019
1	Page 182 Monday or a Tuesday, to about the 15th or so of	1	Page 184  A. That tended to be the case. I mean, he
2	the month, 16th, something like that.	2	might say, I've landed, or he might say, I just
3	Q. Was Ms. Wang there?	3	finished my meeting, or, I'm on the way back.
4	A. Where?	4	That's about the limit of it.
5	Q. At that meeting that you've just	5	Q. And would those be Signal messages or
6	described.	6	some other communication means?
7	A. Who knows. He kept saying he didn't	7	A. Usually on Signal.
8	trust her.	8	Q. Did you keep your Signal messages with
9	Q. I'm asking whether you recall her being	9	Dr. Waller?
10	present?	10	A. I turned over everything I had to
11	A. No, I don't remember, because sometimes	11	whatever is there to Joe.
12	she was in there and sometimes Lianchao was	12	Q. Right. I'm asking
13	there, so I don't remember. He said he didn't	13	A. To the law firm.
14	trust her, so a lot of times he sent her out.	14	Q. I'm asking if you did you delete
15	Q. In other words, she might have been in	15	Signal messages you had with
16	the area, in the building that you were meeting	16	A. Some I have.
17	in, but he would say, leave the room?	17	Q Dr. Waller?
18	A. Yes.	18	A. I always do. Because some I I don't
19	Q. And you would have the meeting without	19	keep Sig all of my Signal messages. That
20	her?	20	means for everybody, not just for Guo.
21	A. Yes, that happened.	21	Q. I understand. And why is it your
22	Q. How many times did that	22	practice to delete messages like that?
23	A. On several occasions.	23	A. Because that's what it's set up for.
24	Q. And were you and Dr. Waller	24	That's what Signal does.
25	coordinating and checking in on the research	25	Q. Oh, there's like an automatic
	70 400		D 405
1	Page 183	1	Page 185
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2 3	after this January 8th start date?  A. Oh, yeah. I mean, obviously, I couldn't I could only do from my side what I	2 3	destruction policy?  A. There's an automatic destruction thing, It's 30 minutes or 30 whatever. An hour.
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	Trench wanop		
1	Page 186 obviously paying for it, what means were	1	Page 188 Q. Did you discuss any other terms at that
2	employed?	2	point, or was that just the focus, the number of
3	A. He bribed people to get it, bribed	3	fish, during the first month?
4	people to take photographs of passports, I guess.	4	A. It was the number of fish for the first
5	I don't know.	5	month.
6	Q. Did he tell you that or is that your	6	Q. I'm asking from your memory
7	assumption?	7	A. Yes.
8	A. He actually told me that. I mean, he	8	Q do you recall discussing any other
9	said that in the meeting. He said, yeah, I had	9	terms of the agreement?
10	to bribe people to take pictures of passports.	10	A. No, we didn't change that term. She
11	Otherwise, I don't know where the other	11	knew that, in the second month, it would be ten
12	information came from.	12	fish.
13	Q. Let's go to the next document.	13	Q. And did you redraft or edit the
14	(Wallop Exhibit 10, Signal messages,	14	agreement based upon this discussion?
15	Bates stamped Eastern-0000201, marked for	15	A. Not that I recall, no.
16	identification.)	16	Q. Well, you did put in that there would
17	Q. This has been marked Wallop 10. Do you	17	be 15 fish during the first month instead of
18	recognize this Signal thread?	18	the
19	A. Well, it looks like it's from me, and	19	A. Yes, because we'd already when was
20	probably to Yvette.	20	this? This was 12/29.
21	Q. Did you ever exchange Signal messages	21	Q. 28.
22	with Lianchao Han?	22	A. 12/28. And I can't even remember on
23	A. I'm sure I have. It may or may not	23	the contract whether it's I don't know if we
24	have had anything to do with this, the contract.	24	even defined whether it was 15 in the first month
25	Q. So you've worked with Mr. Han on other	25	or not, but we went ahead and agreed to the 15;
	Dogg 197		Dogg 190
1	Page 187 matters or	1	Page 189 so, gave her five fish, basically.
2	A. Well, we're pro-democracy, and he	2	Q. Did you ever give her a copy of the
3	represents a pro-democracy group in Washington;	3	agreement for her to make edits?
4	and so, yes, there are issues that are going on	4	A. Yes.
5	about the mainland that had nothing to do with	5	Q. When was that?
6	Guo.	6	A. Because when we talked about it, she
7	Q. Going to Eastern 203.	7	was talking to Guo all the time on the telephone,
8	A. Yes.	8	and we made edits. I remember when she was at
9	Q. Do you see where it says, "yes let's	9	the house earlier that maybe during this time
10	discuss now"?	10	frame, the 29th, or 28th or something. "We are
11	A. Yes.	11	looking at your changes and have made a combined
12	Q. And below that there's like a little	12	document based on our conversation yesterday and
13	phone symbol, do you see that?	13	our mutual agreement." This was on the 29th.
14	A. Correct.	14	So we made it at my house, and then we
15	Q. Do you recall speaking to Ms. Wang	15	agreed to it, and then I went and printed it off
16	about this agreement on or about December 28th?	16	from my printer.
17	A. That would have been correct, because	17	Q. Right. What I'm asking is, did you
18	that's when they sort of were changing the terms	18	you physically gave her a
19	of the contract from ten fish to 15 fish, and	19	A. Yeah.
20	that's what the 15 refers to in her	20	Q a paper copy?
21	Q. And you had a phone conversation about	21	A. Yes, we both did. I mean, we both had
	that?	22	the same piece of paper that we were scratching
		ا دادا	and same proce or paper that we were peraceiling
22		23	up and redoing.
22 23	A. Yes, it's right here. And then I put	23	up and redoing.  O. I wasn't sure of that, that's why I'm
22		23 24 25	up and redoing.  Q. I wasn't sure of that, that's why I'm asking. I don't know that.

	Trench wanop	OII	
1	Page 190 So she left with a copy of the draft	1	Page 192 A. No. It was Mandarin, so he was just
2	agreement on or about	2	speaking to his employee, I guess.
3	A. I believe so	3	Q. But you sitting here today, you're
4	Q December 29th?	4	not certain that it was him?
5	A yes. It says here, "most easy	5	A. I could hear his voice, so it sounded
6	edits, no worries."	6	like him.
7	Q. And that was your comment, correct?	7	Q. Turning to Eastern 206.
8	A. Yes.	8	A. Yes.
9	Q. Why did you think they were mostly easy	9	Q. Do you see this message talking about
10	edits?	10	"unfortunately they could not stop the process
11	A. Well, because she had she had made	11	technically. My Boss said he had already
12	the suggestion on the edits, so I made the	12	contacted you about this fundwe were
13	agreement to go ahead and make the little	13	discussing last week, as I advised you that our
14	changes, whatever they were.	14	people were ready to send you the deposit." Do
15	Q. And did you meet with Ms. Wang again on	15	you see that?
16	or about December 30th?	16	A. I do. I was very confused by that.
17	A. Honestly, I can't remember the 30th. I	17	Q. There's a PDF that was attached to this
18	do remember the I guess it says see, here	18	document, do you see that?
19	it's the 5th. I think it was the 5th that I met	19	A. Yes.
20	her next.	20	Q. Do you have any recollection as to what
21	Q. Let me ask you this. Do you recall a	21	was sent to you on or about January 2nd
22	meeting with Ms. Wang where you thought that she	22	concerning this deposit?
23	was proposing major and unreasonable changes?	23	A. This was, I believe, the copy of the
24	A. Somewhere in that earlier part of that	24	DBS wire. I'm not sure, but I think it was.
25	conversation, and that's when we made the changes	25	Q. And what was your response to receiving
	Page 191		Page 193
1	in the edits. She then consulted with Guo. Guo	1	the wire? Because, correct me if I'm wrong, but
2	agreed to them, there might have been something	2	the contract had not been signed as of
3	he disagreed with, and then he disagreed with	3	January 2nd, 2018, correct?
4	her, and then we went back and re-did the edit	4	A. Not by the 2nd, but we had agreed to
5	back to sort of what the original language must	5	everything on the terms, even though she had to
6	have been in the final copy that she signed, and	6	come back from New York to sign the document; we
7	he agreed to, on the telephone.	7	had agreed by telephone.
8	Q. Was that on January 6th, on the actual	8	Q. Were you surprised to receive the money
9	date of the signing?	9	at that time?
10	A. No, it was a little bit earlier. I	10	A. Not entirely. But we we it came
11	think it goes back here to wherever we were	11	from a source that we didn't know who it was. It
12	talking about mostly easy edits.	12	came from ACA Capital or something. We didn't
13	Q. Okay. Was Mr. Guo on the phone when	13	know who that was.
14	you and Ms. Wang signed the agreement?	14	Q. So how did you find out about that?
15	A. Yes, I think he was. I think he was.	15	Did this message prompt you to check your account
16	Because she sat on the sofa with me, and that's	16	or was it that you checked your account and said,
17	where she was talking to somebody, so I in	17	why is there a million dollars there? What was
18	Mandarin, so I presume that's who it was.	18	the process?
19	Q. Okay. So you didn't know who she was	19	A. It was very simple. I got this
20	talking to at that point, but	20	message
21	A. No, but she it was clear to me that	21	Q. I see.
22	it was Guo. She just sort of hung up, she said,	22	A I checked the account. Something
23	okay, fine, we all agree, everything is fine.	23	from ACA was there. Said, my boss, meaning Guo,
24	Q. But he wasn't on speakerphone, so you	24	said he had already contacted us about this fund.
2 =	didn't hear his moiss?		
25	didn't hear his voice?	25	We never got any contact from Guo. Never. Never

Page 194 Page 196 received a phone call, never received a text, the 5th and she had the bad flash drives, okay? nothing. So I don't know what she's talking 2 That's when I went to the next door neighbor, 3 about here. 3 just to stick it in to see if it was alive or "Our contract won't be changed if there 4 4 not. He didn't see anything, because there was is a chance to work together. Otherwise please 5 nothing to see, and he couldn't have seen 6 kindly return fund." These people were like 6 anything even if he had. So that's exactly what 7 ping-pong balls, okay? You're just trying to do happened. 8 what they're asking you to do, you get everything 8 Turning to Eastern 211. You wrote, 9 in order to do it, and then they fool around with 9 "the agreement for 3 months is correct." Do you 10 this nonsense. 10 see that at the top of the page? Q. 11 Did you consider sending the wire back 11 A. Yes. 12 because you didn't have a signed contract or --What did you mean by that? 12 Ο. 13 No, because we already had agreed to 13 Α. Because the contract was for three 14 this verbally. Both Guo and herself had agreed 14 months, was for 90 days. January, we have 15 to it. And so she then comes down on the 5th, 15 allowed 15 fish. Ten fish each for February and 16 and signs the thing on the 6th. 16 March; for some reason, that's sort of cut off. 17 Ο. And so, going back to the 6th. Were 17 Oh, here it is, March. "We will determine the 18 there any changes made to the agreement at that 18 subsequent monthly costs obviously by the next 19 time? 19 set of numbers of fish in the tank." 20 20 So what would happen after 90 days? Α. No, none. The only change was that I Q. We were all going to regroup and figure 21 21 accepted the 15 fish instead of the ten, I mean, A. 22 verbally. It was a verbal, honorable thing to 22 out how much -- how many of the fish had -- were do. And then here's my thing saying right what I useful information for him and how many fish had 23 said on whatever it is, 208, as discussed with 24 been tossed out, and then he was going to be 25 the 15 fish. 25 adding more fish. He said up to 4,000 fish, Page 195 Page 197 Did you tell Yvette that they shouldn't total. Q. 1 2 have sent the wire from where they had? 2 Would it have been possible to do 3 Well, I -- later on I did. Lianchao 3 investigations on 4,000 fish? Α. Not all at once, and he knew that. He told her; like, what were you thinking? 4 Α. 4 5 Ο. So you had a conversation with Lianchao 5 agreed that would be ridiculous. It was supposed about the wire --6 6 to be a three-year contract. 7 7 A. Later. Q. But it was a -- you're saying it was a 8 -- being done properly? 8 three-month contract? 0. 9 Later, later. Like, two weeks later. 9 It was three months, to be done for a Α. Α. 10 Q. And you understood that Lianchao had 10 year, if you look at the contract itself, and 11 conveyed that to -then, after that time, it was a three-year 11 12 Α. Yes. 12 contract. If you recall, on the last page of the 13 13 agreement, "duration of this contract shall be Ο. -- Ms. Wang? 14 Well, to Guo. He played those two back enforced for three years from the date of Α. 14 signing." That's what we had initially planned 15 and forth. He played Yvette against Lianchao, 15 16 Lianchao against Yvette. 16 on. We certainly had initially planned on the 17 17 Turning to Eastern 208. It says, "We first three months. On Eastern 213, do you see where it 18 hope you will have the docs as discussed for the 18 0. 19 15 fish with you"? 19 says, "can you please send the contract here? I 20 That's right. 20 get the right person to do. Thank you"? Α. 21 Q. And so what was -- was that the -- you 21 Α. That was weird. 22 already understood what that was, that was --22 Q. What did you understand that request to 23 That was this. 23 Α. mean?

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24

25

Α.

Well, we certainly weren't going to

send it through any kind of email thing. So she

24

25

Q.

-- Exhibit 7?

Yes. And that's when she arrived on

	French Wallop	OII	02/12/2017
1	Page 198 had to sign it she had to come she signed	1	Page 200
2	it on the 6th. So she says, "please send the	2	A. Correct. And New York was equally
3	contract here I get the right person to do." I	3	adamant about it. That was Guo.
4	don't know what that meant. "There is of course	4	Q. I was going to say, who's New York?
5	no impasse here. I work with several people, M	5	A. That was Guo.
6	is one of them saying for this project he is not	6	Q. And L is Lianchao?
7	only boss." Well, that was news to us.	7	A. Yes.
8	Q. I'm just asking about why you didn't	8	Q. And who's M?
9	send the contract when it was requested there?	9	A. Michael, Mike, Dr. Waller.
10	A. Because we still didn't have oh,	10	Q. Turning to Eastern 19. You wrote,
11	dear lord. We still didn't have the flash	11	"Thank you. I will look forward to seeing you
12	drives. This was the 5th. We didn't get the	12	tomorrow here. You can make whatever minor
13	proper flash drives with the folder until the	13	changes here on my laptop and then print off two
14	8th, Monday the 8th. So what could we do, except	14	copies"?
15	take except have her sign the contract. They	15	A. Correct. That meant print off two
16	had already sent the money, we all had agreed to	16	copies of the agreement.
17	the terms. She needed to sign the contract.	17	Q. Right. What were the changes or issues
18	Then I went to New York to get a flash drive	18	that you were thinking of at that time?
19	that, God willing, would work, out of the three.	19	A. Whatever changes we made that were
20	And we tried to explain to them that	20	she would I mean, whatever was made was made,
21	their systems were corrupted. If she was	21	and we agreed to in the document. I don't
22	downloading, or he was downloading the stuff from	22	remember. They were minor.
23	his own computer, he was getting he was being	23	Q. You said, "we've already lost a week"?
24	hacked into by the Chinese himself. Because you	24	A. That's right.
25	can't make this stuff up on the on the	25	Q. What did you mean by that?
1	Page 199 corrupted files.	1	Page 201 A. If we didn't have this, we couldn't
1 2		1 2	e
	corrupted files.		A. If we didn't have this, we couldn't
2	corrupted files.  Q. But before January 6th, you weren't	2	A. If we didn't have this, we couldn't start. If we didn't have the entire file, we
2 3	corrupted files.  Q. But before January 6th, you weren't aware of any corruption or hacking issues, were	2 3	A. If we didn't have this, we couldn't start. If we didn't have the entire file, we couldn't start, could we? Because we had no
2 3 4	corrupted files.  Q. But before January 6th, you weren't aware of any corruption or hacking issues, were you?	2 3 4	A. If we didn't have this, we couldn't start. If we didn't have the entire file, we couldn't start, could we? Because we had no information to go on.
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2 3 4 5 6	corrupted files.  Q. But before January 6th, you weren't aware of any corruption or hacking issues, were you?  A. Yes, absolutely.  Q. How were you supposedly aware of that?	2 3 4 5 6	A. If we didn't have this, we couldn't start. If we didn't have the entire file, we couldn't start, could we? Because we had no information to go on.  Q. Did you understand that time was an important factor?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	corrupted files.  Q. But before January 6th, you weren't aware of any corruption or hacking issues, were you?  A. Yes, absolutely.  Q. How were you supposedly aware of that?  A. Well, because we had a corrupt when we were even sitting there, I think at one point Guo had a USB key and he was putting it into his own computer, and it was acting up, and he took it out and he said, I can't I can't do the file here.  Q. When was that?  A. It was before this must have been sometime in mid-Jan mid-December, whenever we were up there meeting with him, he had an issue with the computer. And Mike told him, he said, you know, you got you got issues here that have nothing to do with us.  Q. You wrote, "As you know, the agreement can only be reviewed and cannot be sent by email for the purpose of absolute security"?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. If we didn't have this, we couldn't start. If we didn't have the entire file, we couldn't start, could we? Because we had no information to go on.  Q. Did you understand that time was an important factor?  MR. SCHMIDT: Objection.  A. Of course it was an important factor.  Q. Why was that?  A. Because we were prepared to go, but, due to their corrupt files, we couldn't start until we got the full document that was not corrupted.  Q. Right. But this is January 5th, right, this email message or Signal message?  A. Yes.  Q. And so I'm just asking, you hadn't seen or you hadn't received the files that had any alleged issues with it in terms of  A. Yes. She came on the 5th, she put the files in, they didn't work, they were corrupted.  I then had to get on the train and come up here

1	French wallop		
	Page 202		Page 204
	Q. I thought	1	Q. The financial, forensic research,
2	A. So we couldn't start.	2	current tracking and social media?
3	Q the agreement was signed on	3	A. There were not reports, other than
4	January 6th, though?	4	flash drive information, which we've already
5	A. Yes, but we couldn't start until we had	5	answered that.
6	clean files. She thought she had clean files,	6	Q. Of course we have, yes, but they are
7	and she didn't have them on the 5th and 6th, did	7	referred to as reports in the agreement, so
8	she?	8	that's why I'm using that term.
9	Q. I don't understand how you thought you	9	A. They're flash drives.
10	lost a week, if you hadn't even signed an	10	Q. Okay.
11	agreement yet?	11	A. They're not written.
12	A. Because the funds had been sent, right,	12	Q. And the teams that are already
13	on the 29th, and let's call it the 2nd that we	13	dispatched, how many teams were dispatched as of
14	had received them, and, in fact, they didn't	14	January 9th?
15	really get into our account until the 4th because	15	A. Well, One was in the process of
16	of the holiday weekend and so forth. And then	16	being Number One was being in the process of
17	Citibank called to say, are is this your	17	being dispatched because it was an overseas
18	are these you expecting this? I said yes. So	18	person that was that Mike had to coordinate
19	they were fine. But they were not available	19	with, and we had to get we had to get numerous
20	there's something known as a federal reserve,	20	computers and different kinds of phones and
21	that stops large payments. Anything over, like,	21	burner phones and everything. It's a huge
22	\$300,000 gets flagged. So we had to verify that	22	operation.
23	this was a contract.	23	Q. Were you involved at all in the
24	Q. Let's go to Eastern 223. Do you	24	logistics of that operation?
25	remember Ms. Wang sending you a Signal message	25	A. No. Mike was.
	Page 203		Page 205
1	asking to accommodate two small fish?	1	Q. So he was involved in procuring the
2	A. Two more small fish. So it would have	2	phones and computers and things of that nature
3	made 17 fish, okay? No. The answer was	3	A. No.
4	absolutely no.	4	Q for Team 1?
5	Q. Well, let's just go one at a time.	5	A. Team 1 did it.
6	MR. SCHMIDT: Do you remember receiving	6	Q. Okay. What other teams were dispatched
7	the message or	7	as of January 9th, other than Team 1?
8	THE WITNESS: Yes.	8	A. That was the only "team team" outside
9	MR. SCHMIDT: or	9	of the United States. I was collecting or I was
10	THE WITNESS: Yes.	10	getting ready to begin to collect information
11	MR. SCHMIDT: Okay.	11	from my own channels, which was not labeled as a
12	Q. Okay. And what was your response?	12	team.
13	A. No. Absolutely no. Q. And why did you have that firm	13 14	Q. Right. I'm just trying to understand your message on Eastern 224. At the end it says,
14		15	"Teams are already dispatched and beginning their
14	regnonge?	ا ت	reams are arready dispatched and beginning their
15	response?  A Recause we've already given you five	16	trin"?
15 16	A. Because we've already given you five	16 17	trip"?  A That meant Mike and the person that was
15 16 17	A. Because we've already given you five extra fish, if you will read my response.	17	A. That meant Mike and the person that was
15 16 17 18	A. Because we've already given you five extra fish, if you will read my response.  Q. They did have to pay for those 15 fish,	17 18	A. That meant Mike and the person that was hiring the people to manage this particular
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15 16 17 18 19 20 21 22 23	A. Because we've already given you five extra fish, if you will read my response.  Q. They did have to pay for those 15 fish, though, right?  A. Not really.  Q. Okay.  A. They didn't. They were five free fish.	17 18 19 20 21 22 23	A. That meant Mike and the person that was hiring the people to manage this particular account. It wasn't just one person with one computer. There were at least ten.  Q. Ten individuals?  A. Ten individuals.  Q. On Team 1?

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1 of Team 1 there were? 2 A. Because I was told that by Mike. 3 That's all I know. I don't know who they were, I 4 don't know their names. I don't know anything 5 about it. We compartmentalized it. 6 Q. Right. So you don't have any you 7 played no role in assembling Team 1 or managing 8 its actions? 9 A. My expertise, young man, is 10 Q. I'm not that young, but go on. 11 A is 45 years of working in 12 specialized areas, and I understand how to 13 assemble the right people to do, God knows, the 14 right job. And Mike was one of the people who 15 did dispatch and organize Team 1. 16 Q. Right. So you weren't involved with 17 managing or assembling 18 A. Not on a 19 Q Team 1? 20 A day-to-day because we were 21 compartmentalizing it. 22 Thank you. 2 understand. What was it between the 8th and the 2 l6th that caused a delay? 3 A. Well, we didn't have the equipment to 4 begin to do what we said we wanted to be able to 5 do because of all of these weirdo delays with the 6 flash drives. 7 Q. In other words 8 A. They were corrupted flash drives, 9 right? 10 Q. In other words, you didn't have the 11 equipment to 12 January 1, you had to go and buy it 13 assemble the right people to do, God knows, the 14 Q after the agreement was signed? 15 A. That's correct. And why would that be? 16 Q. I'll be asking the questions. 17 A. I know 18 A. Not on a 18 MR. SCHMIDT: Don't ask questions. 19 Q Team 1? 20 A day-to-day because we were 21 compartmentalizing it. 22 The WITNESS: Yeah, I think we need a 23 asking for an answer. 24 A. I'm giving you one. 25 THE WITNESS: You just don't get it.		French wanop	OII	02/12/2017
1 That's all I know. I don't know who they were, I don't know who they were, I don't know who they mere, I don't know who they were, I don't know which in a don't know their names. I don't know anything a bout it. We compartmentalized it.  4 Q. Right. So you don't have any — you played no role in assembling Team I or managing is its actions?  5 A. My expertise, young man, is —  10 Q. I'm not that young, but go on.  11 A. — is 46 years of working in  12 specialized areas, and I understand how to 13 assemble the right people to do, God knows, the 14 right job. And Mike was one of the people who 15 did dispatch and organize Team I.  16 Q. Right. So you weren't involved with 16 Q. Hight correct. And why would that be?  17 A. Not on a —  18 A. Not on a —  19 Q. — Team 17 A. — day-to-day because we were 20 was assembling it.  20 A. — day-to-day because we were 21 compartmentalizing it.  21 Q. Thank you.  10 A. You're welcome.  11 A. You're welcome.  12 Q. What was the issue that — if we go to 3 asking for an answer.  19 Q. Exhibit ??  10 A. You're welcome.  11 A. You're welcome.  12 Q. What was the issue that — if we go to 3 and loak at the calendar for January. It's easy to 5 and loak at the calendar for January. It's easy to 5 and loak at the calendar for January. It's easy to 5 and loak at the calendar for January. It's easy to 5 and loak at the calendar for January. It's easy to 5 and loak at the calendar out 6 did dispatch and organite ream interesting the generations.  12 Q. Sachibit ?  13 A. That week, Mike and the person from 13 Tean I were coordinating how they were going to 6 did dispatch and person from 13 Tean I were coordinating how they were going to 6 did the departs and were to depart of different countries to get the information — I mann, to get the equipment, so 6 drive to three different countries to get the information that would have been interesting for it would not be tracked. These would be, quote, 19 would be the parameter? I just would not be tracked. These would be, quote, 19 would be track	1	· · · · · · · · · · · · · · · · · · ·	1	Page 208
3 That's all I know. I don't know who they were, I 4 don't know their names. I don't know anything about it. We computermentalized it. 6 Q. Right. So you don't have any you played no role in assembling Team 1 or managing its actions? 9 A. My sepertise, young man, is 9 10 Q. I'm not that young, but go on. 11 A is 45 years of working in assemble the right people to do, God knows, the 14 right job. And Nike was one of the people who did dispatch and organize Team 1. 16 Q. Right. So you weren't involved with 17 managing or assembling 18 A. Not on a 18 A. Not on a 18 A. Not on a 18 A. Then were corrected. Played a saking for an answer. 19 Q. That's correct. Played a saking for an answer. 21 Q. That's fine. You can I'm just 2 asking for an answer. 22 A. I'm giving you one. 23 Bestern 227, that caused a delay of eight days? 4 A. You're welcome. 4 You're welcome. 5 God Kath was the issue that if we go to an and look at the calendar for January I''s easy to ask on the stendard for January I''s easy to see. The 8th Monday the 8th was when we find delays with the fellow have been excepted flash drives. 10 A. That's correct. 11 A. You're welcome. 22 Q. That's privale flash drives. 23 A. They were corrupted flash drives. 24 A. I'm giving you one. 25 Q. That's prival to go and buy it 2 A. You're welcome. 26 Q. What was the issue that if we go to a asking for an answer. 27 A. You're welcome. 28 Gestern 227, that caused a delay of eight days? 4 A. You're welcome. 4 Page 207 5 A. You're welcome. 5 God Rich and Think would be supported for January to the sthe was when we for finally got a decent copy of this, right (indicating)? 10 A. Yes, Eshibit 7. 11 Q. Sure. 12 A. They would not be tracked. These would be, quote, to define the primater of the primater. 13 A. The William of the words 2 A. Think we fine a begin to do with the fellows. 14 D. The William of the words 2 A. Think we can the sequence of the primater. 15 A. The William of the words 2 A. Think we fine a begin to do with the				
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5   about it. We compartmentalized it.				
6   Q. Right. So you don't have any you   7   played no role in assembling ream I or managing   8   15 actions?   9   A. Wy expertise, young man, is   9   C. I'm not that young, but 90 on.   10   A is 45 years of working in   11   assemble the right people to do. God knows, the   13   assemble the right people to do. God knows, the   14   right job. And Nike was one of the people who   15   did dispatch and organize Team I.   16   C. Right. So you weren't involved with   17   managing or assembling   18   A. Not on a   18   Ms. SCEMIDT: Don't ask questions.   18   Ms. SCEMIDT: Don't ask questions.   19   C Team I?   20   A day-to-day because we were   20   Ms. GERNDI: Why don't we take a little break.   21   Little break.   22   C. Thark you.   24   A. I'm giving you one.   25   O. Thark you.   26   C. Scill on Wallow at the calendar for January. It's easy   6   to see. The bth, Monday the 8th was when we   7   finally 9c a decent copy of this, right   18   A. That week, Mike and the person from   19   C. Suze.   10   A. Yes, Exhibit 7.   10   Suze.   11   A. That week, Mike and the person from   12   A. That week, Mike and the person from   13   Team I were coordinating how they were going to drive to three different countries to get the   information I mean, to get the equipment, so the see of the did into the tracked.   These would not be tracked.   These would be hurner phonese. All of these   20   what do you mean by that?   20   What do you mean by parameter? I just these eight days.   24   Why did you mean by that?   25   Why did you mean by that?   26   Why did you mean by that?   27   Why did you mean by that?   28   Why did you mean by that?   29				
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A. My expertise, young man, is —  Q. I'm not that young, but go on.  1 A. — is 45 years of working in  specialized areas, and I understand how to  dright job. And Mike was one of the people who  bid dispatch and organize Team 1.  Read of the right job. And Mike was one of the people who  compartmental izing —  A. Mot on a —  B. A. Not on a —  Q. — Team 1?  A. Not on a —  B. A. Not on a —  Compartmental izing it.  Compartmental izing it.  Compartmental izing it.  A. I'm giving you one.  Compartmental izing it.  Compa			'	*· · · · · · · · · · · · · · · · · ·
10 Q. I'm not that young, but go on. 11 A. — is 45 years of working in 12 specialized areas, and I understand how to 13 assemble the right people to do, God knows, the 14 right job. And Mike was one of the people who 15 did dispatch and organize Team I. 16 Q. Right. So you weren't involved with 17 managing or assembling — 18 A. Not on a — 19 Q. — Team I? 18 A. Not on a — 19 Q. — Team I? 19 A. — day-to-day because we were 20 A. — day-to-day because we were 21 compartmentalizing it. 22 Q. That's fine. You can — I'm just 23 asking for an answer. 24 A. I'm giving you one. 25 Q. That's with you. 26 Eastern 227, that caused a delay of eight days? 4 A. Ckay, you have to take a calendar out 27 and look at the calendar for January. It's easy 28 to see. The 8th, Monday the 8th was when we 29 finally got a decent copy of this, right 19 Q. Exhibit 7? 10 A. Yes, Exhibit 7. 11 Q. Sure. 12 A. That week, Mike and the person from 13 Team I were coordinating how they were going to 14 Q. — after the agreement was signed? 15 A. That's correct. 16 Q. I'll be asking the questions. 17 A. I know — 18 MR. GEERDIT: Non't ask questions. 18 MR. SCHRITT: Dan't ask questions. 19 MR. GEERDIT: Why don't we take a little 19 break. 20 The WITNESS: Yeah, I think we need a 21 little break. 21 THE WITNESS: Yeah, I think we need a 22 aisign. 23 asking for an answer. 24 MR. SCHRITT: That's fine. 25 THE WITNESS: You just don't get it. 26 Q. What was the issue that — if we go to 27 a the VIDEOGRAPHER: Back on the record 28 at 3:32. 29 (Morereupon, a short recess was taken.) 20 A. Yes, Exhibit 7. 20 A. Yes, Exhibit 7. 21 A. That week, Mike and the person from 22 Q. Exhibit 7. 23 A. That week, Mike and the person from 24 A. That week contic fish options to discuss 25 O. That wouldn't be tracked. 26 A. I think we need a 27 intervention — I mean, to get the equipment, so 28 to see. The 8th, Monday the 8th was when we 29 finally got a decent copy of this, right 30 A. Yes, Exhibit 7. 31 Can the the fine the equipment of the fine the equipment of the fine th			-	
11   specialized areas, and I understand how to a seemble the right people to do, 60d knows, the right people to do, 60d knows, the right job. And Mike was one of the people who to did dispatch and organize Team 1.   15   A. That's correct. And why would that be?   16   Q. Right. So you weren't involved with 17   managing or assembling				
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15 did dispatch and organize Team 1.  16 Q. Right. So you weren't involved with 16 Q. I'll be asking the questions.  17 A. I know  18 A. Not on a  19 Q Team 1?  20 A day-to-day because we were  21 compartmentalizing it.  22 Q. That's fine. You can I'm just  23 asking for an answer.  24 A. I'm giving you one.  25 Q. Thank you.  26 Page 207  1 A. You're welcome.  27 Q. What was the issue that if we go to  28 and look at the calendar for January. It's easy  29 to see. The 8th, Monday the 8th was when we  29 finally got a decent copy of this, right  8 (indicating)?  20 A. Yes, Exhibit 7.  21 Q. Sure.  22 A. That week, Mike and the person from 19 Qet the the equipment together. They had to 15 drive to three different countries to get the information I mean, to get the equipment, so 17 they wouldn't be tracked.  21 The WITNESS: Yeah, I think we need a little break.  22 What was the issue that if we go to 2 3:25.  23 asking for an answer.  24 A. You're welcome.  Page 207  25 Q. What was the issue that if we go to 2 3:25.  26 and look at the calendar for January. It's easy 5 to 9:2 Compared to 19 Compared			-	
16 Q. Right. So you weren't involved with 17 managing or assembling 18 A. Not on a 18 MR. SCHMIDT: Don't ask questions. 19 Q Team 1? 19 A but, I mean, this is absurd. MR. GRENDI: Why don't we take a little 20 compartmentalizing it. 21 compartmentalizing it. 22 Q. That's fine. You can I'm just 23 asking for an answer. 24 A. I'm giving you one. 25 Q. Thank you. 26 Thank you. 27 Page 207 28 A. You're welcome. 29 Q. What was the issue that if we go to 30 Eastern 227, that caused a delay of eight days? 4 A. Okay, you have to take a calendar out 5 and look at the calendar for January. It's easy 6 to see. The 8th, Monday the 8th was when we 7 finally got a decent copy of this, right 8 (indicating)? 9 Q. Exhibit 7: 10 A. Yes, Exhibit 7. 11 Q. Sure. 12 A. That week, Mike and the person from 13 Team 1 were coordinating how they were going to 14 get the the equipment together. They had to 15 drive to three different countries to get the 16 information I mean, this is abseurd. 17 A. I think Winy don't we take a little 18 The IP numbers and everything else 19 A but, I mean, this is abseurd. 19 A but, I mean, this is abseurd. 10 MR. GRENDI: Why don't we take a little 11 break. 11 THE WITNESS: Yeah, I think we need a 11 ittle break. 12 MR. SCHMIDT: That's fine. 12 THE WITNESS: You just don't get it. 12 THE WITNESS: You just don't get it. 13 THE VIDEOGRAPHER: Off the record at 14 get videorea. 15 (Mhereupon, a short recess was taken.) 16 (indicating)? 17 Eastern 227. Do you see where you wrote, 'We have some new exotic fish options to diacuss 18 too'? 19 Q. Why did you describe it as a fish option? What does that 19 Q. Why did you describe it as a fish option? What does that 19 Q. What do you mean by parameter? I just want to understand 20 Q. What do you mean by parameter? I just want to understand 21 these wouldn't be tracked. 22 communications had to be coordinated. So from 23 technically, virgin computers, virgin phones, technically, virgin computers, virgin phones, technically,				
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19 Q Team 1? 20 A day-to-day because we were 21 compartmentalizing it. 22 Q. That's fine. You can I'm just 23 asking for an answer. 24 A. I'm giving you one. 25 Q. Thank you.  Page 207 1 A. You're welcome. 2 Q. What was the issue that if we go to 3 and look at the calendar for January. It's easy 4 A. Okay, you have to take a calendar out 5 and look at the calendar for January. It's easy 6 to see. The 8th, Monday the 8th was when we 7 finally got a decent copy of this, right 8 (indicating)? 9 Q. Exhibit 7? 10 A. Yes, Exhibit 7. 11 Q. Sure. 12 A. That week, Mike and the person from 13 Team I were coordinating how they were going to 14 get the the equipment together. They had to 15 drive to three different countries to get the 16 information I mean, to get the equipment, so 1 they wouldn't be tracked. 1 break. 2 THE WITNESS: Yeah, I think we need a 2 break. 2 THE WITNESS: You just don't get it. 2 THE WITNESS: You just don't get it. 2 THE VIDEOGRAPHER: Off the record at 3:25. 3 (Whereupon, a short recess was taken.) 4 THE VIDEOGRAPHER: Back on the record 5 at 3:32. 6 Q. Still on Wallop 10, Bates number 6 Eastern 227. Do you see where you wrote, "We 8 have some new exotic fish options to discuss 9 too"? 10 A. Yes. 11 Q. What did you mean by that? 12 A. I think Mike and I had come up with 13 some information that would have been interesting 14 get the the equipment together. They had to 15 drive to three different countries to get the 16 information I mean, to get the equipment, so 16 they wouldn't be tracked. 17 THE WITDEOGRAPHER: Off the record at 18 STEP VIDEOGRAPHER: Off the record at 19 What dos you wene by the show as when we some new exotic fish options to discuss 19 What dos you mean by that? 20 What do you describe it as a fish option? What does that 21 The WITDEOGRAPHER: Off the record at 22 Own Mall of you wene we were soing to 23 A. Think Mike and I had come up with 24 Some information that would have been interesting 25 Decause it was outside of the parameter? 26 What do you				
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	French wallop	OII V	02/12/2019
1	Page 214  A. Not in depth.	1	Page 216 meeting, if you recall?
2	Q. This comment about, we expect to have a	2	A. We had some information, and I can't
3	fairly full net, was just your assumption?	3	remember if Mike had gotten I don't think he'd
4	A. Yes.	4	gotten the flash drive at that point, that
5	Q. And at that time, you didn't know if	5	particular flash drive, but we were giving him a
6	Team 1 was finding any information or good	6	verbal update on certain people within the
7	information, or anything of that nature?	7	within the file, Exhibit 7.
8	A. We were told that they were finding	8	Q. And you said before that you were
9	information.	9	working around the clock?
10	Q. So, again, how did you get that	10	A. Yes. They were.
11	information if you didn't get it from Dr. Waller?	11	Q. But you weren't. You mean the team was
12	A. He told me, but I've said to you that I	12	or I just want to be precise here.
13	only spoke a little bit to Michael. I did not	13	A. Well, I'm human. I don't work 24/7.
14	know all of the details of that. He said that he	14	Q. I didn't mean that, obviously. But you
15	believed he had some good information that was	15	said you'd been working weekends on this; is that
16	going to make New York, New York, as we called	16	fair to say?
17	him, happy.	17	A. All of us were working, often.
18	Q. I got it. Going to Eastern 235. At	18	Whenever we found a lead, we'd go after it.
19	the bottom of the page you wrote, "We have to	19	Q. And is that just standard procedure for
20	finish shopping and we'll find a very nice	20	
21	present for." That's all it has there.	21	A. Yes.
22	What did you mean by finish shopping,	22	Q and engagement of this nature?
23	if you recall?	23	A. Yes.
24	A. Well, we we're let's see. This	24	MR. SCHMIDT: Just let him finish the
25	was ten days into the contract, essentially. We	25	question.
	Page 215		Page 217
1	Page 215 were working through weekends, so we were trying	1	Page 217 MR. GRENDI: That's okay.
1 2	e e e e e e e e e e e e e e e e e e e	1 2	•
	were working through weekends, so we were trying		MR. GRENDI: That's okay.
2 3 4	were working through weekends, so we were trying to retrieve information, according to Mike, that was that we felt that was going to be very useful for him. Again, I did not know what those	2 3 4	MR. GRENDI: That's okay.  A. Yes.  Q. And does that schedule ever let up during an engagement or is it just typical for
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	French Wallop	on (	02/12/2019
	Page 230	1	Page 232
1	A. No.	1	Q. Right.
2	Q. Let's go to Eastern 259. Do you see	2	A. Yvette was taken off the case in, as we
3	where Dr. Waller wrote, "our understanding was that the first 90 days would be for starting up	3	understand it, beginning the 1st of February.
4	•	4	And then she she sent us an email saying she
5	and developing the data"?  A. I see that.	5	was no longer in it, that only to to communicate with Lianchao.
7		7	
8	Q. Was that Strategic Vision's understanding as well or just Dr. Waller's?	8	Q. Did Strategic Vision adjust its research approach based upon this request for
9	A. No, it was our mutual understanding	9	more immediate results?
10	between Guo and myself and Lianchao and Mike.	10	A. No. In fact, we actually increased the
11	Q. Do you see where it says, he wrote, "We	11	pressure on Team 1, and then went and had a
12	did not understand that he expected actual data	12	long several meetings with potential Team 2,
13	in the first days or weeks"?	13	and that's another side of it.
14	A. Correct.	14	Q. Is that a company that goes by the
15	Q. Again, you never talked to Dr. Waller	15	acronym ASOG?
16	about this exchange after	16	A. Yes. In Dallas. Outside of Dallas.
17	A. Not about	17	Q. And why was it that ASOG was contacted
18	Q it happened on the	18	in connection with this research agreement?
19	A this exchange, no.	19	A. Because we had the option of being able
20	Q. Did you ever discuss the substance of	20	to bring in whatever teams we felt were going to
21	this exchange, or something akin to it, about the	21	be additionally viable, and also on the domestic
22	expectations of the client?	22	side of some of the things that we were bumping
23	A. Perhaps later that when we were	23	into, or Mike and his team were bumping into on
24	talking about what what we had been able to	24	the international side, which were not pretty.
25	retrieve so far, and how we had let me just	25	So, we were given the names of the
	Page 231		Page 233
1	read this. How Mike had explained very	1	fellows who had been with NSA, DIA, whatever,
2	patiently, very calmly, very slowly, whether it	2	in in in Dallas, and we went and met with
3	was with or through Lianchao or through	3	them, and they told us they looked at we
4	Yvette, how the process works.	4	only gave them like a couple of names, we never
5	So, if Guo wanted to speed up and get	5	gave them the whole file.
6	everything really fast, then all the trap doors,	6	And they looked at it, and then we went
7	all the doors that we had been able to open	7	back about a week later maybe, it might even have
8	quietly, would be slammed shut. If Guo would	8	been ten days later, a week later, and they were
9	just be patient and let us get into where we	9	totally freaked out. They said, you can't touch
10	needed to go quietly, he was going to get an	10	any of these people or any of these names. We
11	awful lot of information back.	11	said, what are you talking about?
12	The irony is, that had he just relaxed	12	That's when they said, these are all
13	and stayed on top of this, that is Guo, he would	13	RPs. We will all go to jail if you start fooling
14	have had a huge amount of information three	14	around in their files.
15	months a year in. Huge. We can't fix somebody's	15	Q. So when did you first meet with ASOG,
16	perception of how this is done. He was very	16	that meeting in Dallas you just described?
17	impatient.	17	A. Yeah, it would have been the beginning
18	Q. When did you understand that Mr. Guo	18	of February, I should think. Again, Mike has the
19	was getting impatient?	19	date.
20	A. I guess around well, certainly on	20	Q. Is there any reason a second team
21	the 26th, when we sort of had our lunch with him,	21	wasn't assembled at the outset of the agreement?
22	and then and then I think possibly through	22	A. We did because of the element of
23	Lianchao; because, as I told you, we never had	23	retrieval we had to do outside of the United
24	any direct contact with with Guo. It was	24	States, because he wanted it so fast and so
25	always through Lianchao or Yvette.	25	quickly and intensely, that that was the fastest,

	Trench wanop	011	V=1 ==1 = V = /
1	Page 234 quickest way of getting into certain files had	1	Page 236 them the whole file. We only gave them like, I
2	they not all had some of them not been fake,	2	don't know, maybe four or five names.
3	then we would have had no we wouldn't have	3	Q. Okay. But what I'm just trying to
4	gone to the second second dimension.	4	understand is
5	Q. And the decision to go with the second	5	A. And I
6	team, was that Strategic Vision's	6	Q and I know this sounds like a basic
7	A. Mine	7	question
8	Q decision or Dr. Waller's?	8	A. Right.
9	A. Mine and Mike's, yeah.	9	Q and I apologize. But are all people
10	Q. Jointly?	10	restricted persons in intelligence files or
11	A. Jointly.	11	government files?
12	Q. Okay.	12	A. No.
13	A. We both went down twice.	13	Q. Okay. So there are certain people
14	Q. And you said RP. What does RP mean?	14	A. No, no, no, no. These were tagged.
15	A. Restricted persons.	15	Q. Specially tagged?
16	Q. And in your career in this	16	A. These were tagged. And I again, you
17	investigatory field, have you encountered	17	would have to ask Mike. I don't know if it was
18	restricted persons before or	18	the whole file that was tagged or if it was just
19	A. Yes and no. It's had different	19	four or five names they ran through the system.
20	acronyms. Sometimes it's PP, protected persons.	20	Q. I see.
21	Sometimes it's RP. But it means that it is	21	A. But they were all tagged; flagged,
22	either under a watch list by the U.S. Government	22	tagged, whatever you want to call it.
23	or it is a or, let's just say a certain agency	23	Q. So when did you convey to the client
24	has tagged these individuals and is watching them	24	that there was this restricted persons
25	themselves. So we cannot enter into those files	25	designation on some of the fish?
		1	_
1	Page 235	1	Page 237
1 2	at all in the U.S.	1 2	A. We did that through Lianchao.
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	French wallop on 02/12/2019			
1	Page 238	1	Page 240	
1 2	coincidence or is that  A. I would find it an extraordinary	1 2	their new address, or some sort of preliminary	
3		3	stuff that was being brought up, but if you were	
4	coincidence. These guys are so deep-sixed that, just even to physically find them is like	4	getting into deeper stuff, you couldn't touch it.  You shouldn't touch it. And I'm sure he conveyed	
5	difficult.	5	that to the to the Team 1 leader.	
6		6	Q. So it's your understanding Strategic	
7	Q. So deep-sixed, you mean they're inaccessible or	7	Vision's understanding that Team One's work was	
8	A. Inaccessible.	8	curtailed because of the discovery that certain	
9		9	fish were restricted persons or records	
10	<ul><li>Q they keep a low profile?</li><li>A. Yeah. They had a very low profile and</li></ul>	10	protected?	
11	they had a very low profile location.	11	A. That's correct.	
12	Q. And how is it that you knew about them,	12	Q. And that was on or about January 30th,	
13	ASOG?	13	or whereabouts?	
14	A. Through Mike and one of his people.	14		
15	O. And so, did there come a time when ASOG	15	A. No, no, no, no, no, no. This was way into the middle, the 15th to the 20th,	
16	,	16		
17	said, well, we can't do any research on this because of this	17	something in there, of February.	
18		18	Q. That's when ASOG conveyed to you that	
19		19	A. Yes.	
	Q records protected status?			
20	A. Yes. That's right.	20	Q you were okay.	
21 22	Q. I understand you're eager to move forward, but, just for the court reporter, just	22	So let's just get a clear record then.	
23	please wait for me to ask the question.	23	When did ASOG tell you that certain people were certain fish were records protected?	
24		24		
25	Could Strategic Vision still perform	25	A. At some point in Feb in the middle	
45	some research, though, even though some of the	45	of February 2018.	
	Page 239		Page 241	
1	individuals were designated as records protected,	1	Q. And then is it your understanding that	
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		op on	
1	Page 2.  A. Yes. It's on all the documents	12 1	A. I personally did not, no.
2	somewhere.	2	Q. Do you know if Dr. Waller did that
3	Q. I'm asking if Strategic Vision has lik		or
4	an office with	4	A. Well, he did on the 30th, obviously.
5	A. No. It's an agent. It's an LLC.	5	Q. Right. I'm talking about after the
6	That's where they set them up. Like Wyoming.	6	30th.
7	Q. And what's in Wyoming, I'm sorry?	7	A. Okay. Well, I don't know. I don't
8	A. LLCs. There are a lot of LLCs and	8	know.
9	corporate trusts and so forth set up in Wyoming,	9	Q. Okay. It says, "Eastern agreed to
10	as there are in Nevada.	10	delay the start of the contract by ten days from
11	Q. Those are your corporate trusts and	11	January 6th to January 16th." Do you see that on
12	LLCs?	12	the first page, Eastern 198?
13	A. No.	13	A. Yes.
14	Q. I just want to clear it up.	14	Q. Is that the ten-day grace period or
15	You just mean it's a popular state for	15	accommodation that you were talking about
16	incorporation?	16	A. Correct.
17	A. Correct.	17	Q regarding the January
18		18	A. Yes.
19	Q. Thank you. So when did you first see this letter?	19	
20	•	20	
21	A. Oh, when I probably returned from the Middle East; I think it was probably, I don't	20	
22	know, the first or second week of March.	22	Q. Thank you.
23		23	Did Strategic Vision attempt to contact
			Mr. Guo or Lianchao or Ms. Wang after receipt of
24	A. I thought it was idiotic, yes.	24	this letter?
25	Q. Why did you think it was idiotic?	25	A. Well, Yvette had been taken off the
_			
_	Page 2		Page 245
1	A. Because we heard nothing from them. W	e   1	case. She was forbidden, apparently, to have
2	A. Because we heard nothing from them. We were continuing to do the work. And it was	e 1 2	case. She was forbidden, apparently, to have anything to do with it. So the only two people
2 3	A. Because we heard nothing from them. We were continuing to do the work. And it was silly.	e 1 2 3	case. She was forbidden, apparently, to have anything to do with it. So the only two people that would have been contactable would have been
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Because we heard nothing from them. Were continuing to do the work. And it was silly.  Q. What work was Strategic Vision doing after January 30th that  A. All of February. Or up until the 23rd of February, to be precise.  Q. And were there any meetings with  Lianchao Han and Mr. Guo after January 30, 2018?  A. Not with us, no.  Q. With whom, then?  A. With Mike and myself, no. With  Lianchao and Guo, possibly. I don't know.  Q. Let me ask this then. Did you or  Dr. Waller meet with Lianchao after January 30, 2018 concerning this contract?  A. That's a good question. I doubt it, because I didn't know that there was any issue other than, you know, we were doing our best and pedaling fast.  Q. So Strategic Vision didn't deliver any information to Lianchao, or certainly Yvette, after January 30, 2018?	e 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	case. She was forbidden, apparently, to have anything to do with it. So the only two people that would have been contactable would have been Lianchao and I'm sure that again, I'm not sure of the dates, but I'm sure and Lianchao travels, too, so I'm not sure where he was in February, but I'm sure that both Mike and I must have had some conversation with him in February, after this.  Q. But you don't remember that, sitting here today, what that conversation was like?  A. No. Well, I mean, we were very surprised and very unhappy, and we'd been working hard to to do what Guo wanted, so  Q. And did Lianchao say anything back to you, or what was discussed?  A. I think he said that, you know, Guo gets upset all the time about a lot of things, and so maybe we he could smooth it over and calm him down and so forth. And then we just, I think, hoped that that would happen, and it didn't. So then the this thing was done, so we just stopped.

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	French wanop	OII	02/12/2019
1	Page 246 Q. When did you instruct Mike, or anyone	1	Page 248 stamped SVUS000040 and SVUS000041, marked
2	else involved with the Strategic Vision team, to	2	for identification.)
3	just stop work on this project?	3	Q. Just take a moment to take a look at
4	A. After the 23rd of February.	4	these two documents, SVUS40 and 41.
5	O. You don't remember the exact date?	5	A. Correct.
6	A. No. We had things in the hopper that	6	
7		7	
	were being produced, but they we bought them,		A. Yes, I do. O. What are they?
8	so we had to pay for them, so when we got the	8	•
9	information, then we could produce it, but	9	A. I think these were done by the I
10	Q. And did Dr. Waller fly to Europe to	10	can't remember if these were done by the ASOG
11	tell the leader of Team 1 to stop work, or how	11	guys. I think they were done by the ASOG guys,
12	did that happen?	12	because of the socials. And they were Xi
13	A. I'm not sure. You would have to ask	13	Ping Xi Jinping, who is the premier of China,
14	him how he did that. He may have met with him	14	and then his number 2, the next vice president of
15	overseas.	15	the communist party in China.
16	Q. Okay. In connection with splitting the	16	And this is a this is a sort of a
17	profits from this engagement with Dr. Waller, do	17	geo geologic I mean, how would I put it?
18	you owe him money, or does Strategic Vision owe	18	It's sort of a graph of the connections between
19	him money I should say?	19	certain families that were in the original
20	A. First of all, there weren't profits.	20	document that we were investigating. So this was
21	Q. Earlier we discussed your arrangement	21	like a not a flow chart; this was like a
22	with Dr. Waller to split the proceeds of this	22	genealogical I don't know what you want to
23	engagement, correct?	23	call it chart.
24	A. That's correct.	24	Q. A family tree, is that what it is?
25	Q. And has that splitting occurred, is	25	A. It's sort of a family tree, yeah. But
	Page 247		Page 249
1	what I should ask?	1	it shows the relationships of many of these
2	A. Yes, because our time was valuable for	2	people that were in our original document from
3	those two months, plus the people that we had	3	Guo.
4	already contracted to pay for the research and so	4	Q. Did you give this document to the
5	forth. We expected to have a three-month	5	client?
6	contract at the very least, which were the terms	6	A. To the client?
7	of the agreement, so	7	Q. Yeah, did you deliver this family tree?
8	Q. And what I'm asking is, did you at some	8	A. This is when we were told they were
9	point send Dr. Waller a wire or write him a check	9	RPs.
10	for his half of this engagement?	10	Q. So you got this information on or about
11	A. I already answered yes.	11	February 15th?
12	Q. And that was was that \$250,000 that	12	A. Yes. Again, I would have to yes.
13	you referred to earlier?	13	Q. But you didn't give it to Lianchao?
14	A. Yes. More or less. Plus expenses,	14	A. We never gave it to him. We told
15	travel expenses and other expenses.	15	Lianchao.
16	Q. And there was another wire for about	16	Q. What this family tree or
17	\$300,000 for Team 1, right?	17	A. Yes.
18	A. Yes, at least.	18	Q chart includes?
19	Q. Okay. So as far as you and Dr. Waller	19	A. We told them that they were all RPs,
20	are concerned, there's nothing left to split,	20	that the names that we had were RPs that we had
21	that's already been	21	given in. And, again, Mike would remember how
22	A. Oh, that baby that train's long left	22	many of these we gave.
23	the station.	23	Q. And just turning to the second page
24	MR. GRENDI: Let's go to 14.	24	A. Okay.
25	(Wallop Exhibit 14, Document Bates	25	Q SVUS41?
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	French Wallop	011 (	<del></del>
1	Page 254 (Wallop Exhibit 16, Invoice from Allied	1	Page 256 screamed and hollered, and that's why
2	Special Operations Group, Bates stamped	2	A. Well, yeah, because normally we
3	SVUS000262, marked for identification.)	3	understand look, again, a little bit in the IC
4	MR. SCHMIDT: After this document, why	4	is that that, when you get into certain
5	don't we take a two-minute break?	5	records' protected arenas you cannot, you cannot
6	MR. GRENDI: Yeah, sure.	6	invade that space.
7	Q. So do you recognize this document, this	7	So while they were sniffing around the
8	invoice from Allied Special Operations Group?	8	edges of each one of these files, we said, you
9	A. Correct, ASOG.	9	know, between us, we can't touch it, so there
10	Q. And why was the invoice reduced from	10	should be no bill. So then that's when they sent
11	over \$100,000 to \$5,000?	11	the \$5,000 bill.
12	A. Because they couldn't touch the they	12	Q. Because they had spent some time trying
13	couldn't go into the files that they had that	13	to do this?
14	they had with the names; they could have gone to	14	A. They'd spent a week. And the time
15	prison, all right? So they refunded us or	15	the timing thing is there, the time whatever
16	refunded is the wrong word. I wish they had	16	it is. Our rate, hours worked. And those are
17	refunded, but, no, they sent us a bill in	17	the initials of the people that worked there.
18	other words, so that you can see what this sort	18	MR. GRENDI: We can take that break
19	of thing actually cost, this is what these things	19	now, if you like.
20	cost, and this was only for a few names, and this	20	THE VIDEOGRAPHER: Off the record at
21	is only for one week. So they you know, we	21	4:41.
22	bit and screamed and hollered, and so they ended	22	(Whereupon, a short recess was taken.)
23	up sending us the the bill for the 5,000.	23	THE VIDEOGRAPHER: Back on the record
24	5,412.50.	24	at 4:48.
25	Q. So, originally, ASOG was trying to get	25	MR. GRENDI: Let's do Exhibit 17 here.
		_	
1	Page 255	1	Page 257
1 2	\$105,000 from	1 2	This will be Wallop 17.
2	\$105,000 from A. It was 111,000.	2	This will be Wallop 17.  (Wallop Exhibit 17, Document Bates
2 3	\$105,000 from  A. It was 111,000.  Q. Oh, I'm sorry. Did I miss I thought	2 3	This will be Wallop 17.  (Wallop Exhibit 17, Document Bates stamped SVUS000272 to SVUS000277, marked for
2 3 4	\$105,000 from  A. It was 111,000.  Q. Oh, I'm sorry. Did I miss I thought I no, that's fair. Yeah, 111.	2 3 4	This will be Wallop 17.  (Wallop Exhibit 17, Document Bates stamped SVUS000272 to SVUS000277, marked for identification.)
2 3 4 5	\$105,000 from  A. It was 111,000.  Q. Oh, I'm sorry. Did I miss I thought  I no, that's fair. Yeah, 111.  A. \$111,700. That's what these people	2 3 4 5	This will be Wallop 17.  (Wallop Exhibit 17, Document Bates stamped SVUS000272 to SVUS000277, marked for identification.)  Q. Do you recognize this document,
2 3 4 5 6	\$105,000 from  A. It was 111,000.  Q. Oh, I'm sorry. Did I miss I thought I no, that's fair. Yeah, 111.  A. \$111,700. That's what these people charge. Not these people, but the industry	2 3 4 5 6	This will be Wallop 17.  (Wallop Exhibit 17, Document Bates stamped SVUS000272 to SVUS000277, marked for identification.)  Q. Do you recognize this document,  Ms. Wallop?
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	Trench wanop on 02/12/2019				
1	Page 278 activities recruiting, vetting, engaging and	1	Page 280 Q. And what vetting was done to select		
2	marshaling the initial efforts of the various	2	the well, what vetting was done to select Team		
3	investigators and analysts in The United States,	3	1?		
4	Europe and the Middle East." Do you see that?	4	A. Experience.		
5	A. I do.	5	Q. So just Dr. Waller's experience with		
6	Q. Did Eastern ever engage any analysts in	6	Team 1?		
7	the Middle East?	7	A. Yes.		
8	A. Eastern?	8	Q. Let's look at paragraph 62. Paragraph		
9	Q. Oh, I'm sorry, Strategic Vision. Did	9	62 says that, "Mr. Guo provided to Strategic		
10	Strategic Vision ever engage any analysts in the	10	Vision a list of 92 potential subjects with no		
11	Middle East?	11	prioritization." Do you see that in the middle		
12	A. It could have, and I wouldn't know. It	12	of the paragraph there?		
13	could have been done through Team 1.	13	A. I do.		
14	Q. Wasn't Team 1 located in Europe?	14	Q. And what list was that that had just 92		
15	A. They were, but they could have they	15	non-prioritized names?		
16	all have links.	16	A. Exhibit 7.		
17	Q. Okay. Let me ask you this then. So is	17	Q. So you didn't understand that there was		
18	it your understanding that Team 1 could farm out	18	any priority to the 15 names that are in very		
19	its responsibilities to other teams to help it	19	large font with numbers next to them?		
20	get information?	20	MR. SCHMIDT: Objection. Go ahead.		
21	A. It was all part of the team.	21	A. No, I would not I would not agree		
22	Q. Right. What I'm asking is, did Team 1	22	with that. We numbered them as to priority.		
23	have subteams?	23	Q. Well, you received the document with		
24	A. No. They would have had teams that	24	the numbers next to let's just say, if you		
25	well, if you call them subteams, they weren't.	25	look at the first page?		
		_			
1	Page 279 They were part of the original team. And if they	1	Page 281		
1 2	They were part of the original team. And if they	1 2	A. Yes.		
2	They were part of the original team. And if they used people in the Middle East or Europe or	2	A. Yes. Q. It says Anita Suen		
2 3	They were part of the original team. And if they used people in the Middle East or Europe or wherever you know, the dark web has no	2 3	A. Yes. Q. It says Anita Suen A. Yeah.		
2 3 4	They were part of the original team. And if they used people in the Middle East or Europe or wherever you know, the dark web has no geographical location, so it could have been	2 3 4	A. Yes. Q. It says Anita Suen A. Yeah. Q and it has a big 1 next to it?		
2 3 4 5	They were part of the original team. And if they used people in the Middle East or Europe or wherever you know, the dark web has no geographical location, so it could have been anywhere that they were they were challenging	2 3 4 5	A. Yes.  Q. It says Anita Suen  A. Yeah.  Q and it has a big 1 next to it?  A. Yes.		
2 3 4 5 6	They were part of the original team. And if they used people in the Middle East or Europe or wherever you know, the dark web has no geographical location, so it could have been anywhere that they were they were challenging each other to find what they needed to find.	2 3 4 5 6	A. Yes.  Q. It says Anita Suen A. Yeah.  Q and it has a big 1 next to it?  A. Yes.  Q. It also has the types of reports, does		
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	Trench wanop on 02/12/2019			
1	Page 282 words. You have to go by the subject. See,	1	Page 284 Q. Who did you understand was doing that	
2	like, here is the second fish (indicating).	2	surveillance, you mean the building security or	
3	Q. Right.	3	the	
4	A. So the second fish is on page 11.	4	A. Oh, any number of people could easily	
5	Q. Right.	5	do the the security. Mike's face is very	
6	A. Okay. So you you'd have to go so	6	recognizable, people who knew who Mike was;	
7	these 15 fish are in here at least at least 15	7	anybody in the Chinese communist party would have	
8	fish in here.	8	made us, so	
9	Q. And you understood that those were	9	Q. I see. But Strategic Vision did meet	
10	the or Strategic Vision understood that those	10	with Mr. Guo repeatedly after the contract was	
11	were the 15 fish that the research was supposed	11	signed?	
12	to start on, correct?	12	A. We tried not to.	
13	A. Yes.	13	MR. SCHMIDT: Objection.	
14	MR. SCHMIDT: Objection.	14	THE WITNESS: Oh, sorry.	
15	Q. Do you still have the virgin laptop	15	MR. SCHMIDT: It's okay.	
16	that's described in paragraph 63?	16	A. We tried not to. We explained to him	
17	A. Yes.	17	after about maybe the fourth time that we just	
18	Q. And do you just have a ton of these	18	couldn't do that anymore, it was just really	
19	virgin laptops lying around, because of your	19	dangerous for him and dangerous for us.	
20	Strategic Vision's work?	20	Q. Just so we're clear. The last time you	
21	A. On this specific issue, we had two	21	personally met with Mr. Guo was was that	
22	domestic ones, ones here, and then a battery of	22	January 30th?	
23	ones overseas.	23	A. That was the 26th. No, it was the 26th	
24	Q. Could Strategic Vision get those	24	of January, because the 30th was when Mike met	
25	laptops if they request it requested them from	25	with Yvette at Union Station.	
		1		
	Page 283		Page 285	
1	Page 283 Team 1?	1	Page 285 Q. Got it.	
1 2		1 2		
	Team 1?		Q. Got it.	
2	Team 1?  A. Never. They've been destroyed. They	2	Q. Got it. A. Or Penn Station.	
2 3	Team 1?  A. Never. They've been destroyed. They were destroyed on purpose, because we would	2 3	Q. Got it. A. Or Penn Station. Q. When did Mr. Guo summon you to his	
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Page 286 Page 288 did not alert Eastern, we alerted Guo and we 1 you'll be in bigger trouble than we will. They'll send you back to China. 2 alerted Lianchao, and -- and I believe that 2 3 Yvette was alerted -- no, I don't think -- Yvette 3 Going to paragraph 71. It says: may not have been alerted because that was -- by 4 "In the face of Eastern's insistence, that time, it was in February. 5 however, Strategic Vision hand-delivered its raw 6 It says most of the individuals. Is 6 data to Mr. Guo and Eastern on January 26, 2018, 7 that most of the fish? 7 with the caveat that it would be of no use to 8 8 Eastern until Strategic Vision had an opportunity Α. Yes. 9 Is it fair to say that ASOG only looked 9 to analyze it and produce a formal report"? 10 into five individuals on the list? 10 Yes, that's correct. And formal report 11 I don't know how many they looked into. 11 would have meant, not just sort of a -- a file Again, you would have to ask Mike. They could 12 that had been encrypted, but it also needed to 12 13 have looked into all of them. I honestly don't 13 have Chinese translation, as I understood it, and 14 remember. 14 also needed to have -- and also needed -- there 15 Q. Let's look at paragraph 70. 15 are certain lines of code. 16 Look, I'm not a code expert, but there Α. 70? 16 17 Ο. 7-0, yeah. 17 are lines of code that people have to go through 18 Α. Okay. 18 and actually sort of translate into a language, 19 It says, "Strategic Vision verbally 19 and he kept -- and it takes time to actually reported to Mr. Guo and Eastern that Strategic 20 translate that code. You can't just stick it 20 21 Vision could not within the limits of U.S. law 21 into a machine and expect it to happen. obtain the information sought by Eastern on its 22 So we gave him the raw code, I believe, initial list of subjects and that Strategic 23 on both the 26th and the 31st, or the 31st of Vision's work would be refocused upon others on 24 January, those two different USB keys. 25 Eastern's list." 25 Then it says, "until Strategic Vision Page 287 Page 289 Do you remember when you told had an opportunity to analyze it and produce a 2 Mr. Guo --2 formal report." How would that work? 3 That must have --3 Α. Well, we needed to be able to take that 4 Ο. -- this information? 4 USB key back to the Team 1 to have them go 5 That must have been through Lianchao. 5 through and -- and configure however it was And you keep using the word Eastern. It would supposed to be done. And that was not -- that 6 6 7 7 have been -was not my area, that was Mike's area, and Mike 8 Q. I was just reading the complaint. 8 can explain that really succinctly to you. Yeah, but it's -- it's not Eastern. 9 Paragraph 74. There's a reference to a 9 Α. Q. 10 It's Guo. And I think it would have been -- that 10 wire reversal? 11 would have been at the -- that would have been at 11 Α. 12 the -- at the January 26th lunch. 12 How did that attempted wire reversal 13 13 It says, "As a result, Mr. Guo became come to your attention? Q. 14 enraged"? 14 That was wild. I got a call, like, Α. about the -- I have to see, I think it was around 15 Α. Yes. He was -- I thought he was going 15 16 to jump on the table. 16 the 12th or the 16th or something like that of 17 "And irrationally insisted that 17 January 2018, and -- from Citibank wire 18 Strategic Vision immediately deliver its work 18 department saying that there'd been a request to 19 product"? 19 have 499,000 and some change reversed back to the 20 That's correct. And continue to dive 20 sender. And I said, well, what are you talking 21 into illegal areas. And we said, we can't do 21 about? She said, well, we've gotten a request. 22 that. That's when Mike apologized and said, 22 So then I called one of my private 23 bankers at Citibank and I said, can this be done? 23 we're really sorry, but, you know, there are certain things we can do, and we'll get, but 24 I've never heard of such a thing. He said, there are other things we can't do, and we -absolutely not, it can never be done. Once the

	Tienen wanop		
1	Page 298 in for the protection of the parties, is that a	1	Page 300 A. He represented Guo represented that
2	fair statement?	2	he was, in fact, the person that was going to
3	A. That's a fair statement.	3	fund this. So I presumed, when Yvette's sitting
4	Q. And you, being Strategic, took some	4	next to me and having conversations with him,
5	steps to maintain the identity of the parties, to	5	along with along with all of the conversations
6	keep the identity of the parties secret, is that	6	that we'd had in his apartment, that obviously
7	fair?	7	it's Guo with whom we are dealing. So Guo equals
8	A. That's correct.	8	Eastern, one would presume. Just saying.
9	Q. And is it is it one of Strategic's	9	Q. Did you do any independent research to
10	business goals to protect the identities of its	10	determine whether or not that was that Guo
11	clients, generally speaking?	11	equaled Eastern?
12	A. Yes, because it's generally a private	12	A. It's it's so redundant, but, no, we
13	agreement or an arrangement between my clients	13	didn't, because he said he was going to fund it,
14	and myself.	14	whatever it was, and we did not know the name of
15	O. And was this agreement different in	15	the entity that he was going to use.
16	that regard in any way from your other clients;	16	Q. When did he first tell you that it
17		17	would be an entity and not himself personally
18	was there a heightened degree of security or a sense of keeping things keeping the names of	18	
19	the parties confidential?	19	that would be the counterparty to the contract?  A. Because he said that he had accounts
20	A. Absolutely	20	everywhere and that it would probably be through
	MR. SCHMIDT: Objection. But go ahead.	21	the U.K. office of William Wu or William Yu, or
21 22	THE WITNESS: Sorry.	22	whatever his name was, that was the his
23	MR. SCHMIDT: No, that's fine.	23	financial person.
24		24	_
25	A. Absolutely. Q. When you learned that Eastern would be	25	Q. And when did you find that out; when was the first time?
25	Q. When you learned that Eastern would be	25	was the lifst time:
1	Page 299		Page 301
1	signing the contract on January 6th, the date	1	A. When did I find it out? I mean, we
2	signing the contract on January 6th, the date that you and Yvette executed the contract, did	2	A. When did I find it out? I mean, we were discussing the payment process and how that
2 3	signing the contract on January 6th, the date that you and Yvette executed the contract, did you speak to Mr. Guo at any point thereafter,	2 3	A. When did I find it out? I mean, we were discussing the payment process and how that would work after looking at the we had the
2 3 4	signing the contract on January 6th, the date that you and Yvette executed the contract, did you speak to Mr. Guo at any point thereafter, prior to signing the contract but after learning	2 3 4	A. When did I find it out? I mean, we were discussing the payment process and how that would work after looking at the we had the vision paper, we had the the Word
2 3 4 5	signing the contract on January 6th, the date that you and Yvette executed the contract, did you speak to Mr. Guo at any point thereafter, prior to signing the contract but after learning that Eastern would be the signatory?	2 3 4 5	A. When did I find it out? I mean, we were discussing the payment process and how that would work after looking at the we had the vision paper, we had the the Word presentation, we had done another sort of vision
2 3 4 5 6	signing the contract on January 6th, the date that you and Yvette executed the contract, did you speak to Mr. Guo at any point thereafter, prior to signing the contract but after learning that Eastern would be the signatory?  A. Gosh, I well, let me see. So she	2 3 4 5 6	A. When did I find it out? I mean, we were discussing the payment process and how that would work after looking at the we had the vision paper, we had the the Word presentation, we had done another sort of vision paper; all of these were in different discussions
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	D 200		D 200
1	Page 306 understanding at that time that Yvette was on the	1	Page 308 DECLARATION
2	telephone with Mr. Guo.	2	DECEARATION
	-		T house coutiful that having been first
3	Did you ask Yvette to ask Mr. Guo if he	3	I hereby certify that having been first
4	would personally sign the contract?	4	duly sworn to testify to the truth, I gave the
5	A. No.	5	above testimony.
6	Q. And how long was that meeting at which	6	
7	you found out that Eastern would be signing, and	7	I FURTHER CERTIFY that the foregoing
8	you and Yvette signed the contract?	8	transcript is a true and correct transcript of
9	A. I have no idea. It was during that	9	the testimony given by me at the time and place
10	moment when she had the paperwork and we made the	10	specified hereinbefore.
11	changes, we agreed to the changes, she signed,	11	
12	and then I signed, and it had Eastern on the top.	12	
13	That's all I know.	13	
14	Q. All in all, two hours?	14	FRENCH WALLOP
15	A. Maybe. Let's call it two hours, to	15	
16	make you happy.	16	
17	Q. No, not I want the truth. No answer	17	
18	is going to make me happy.	18	Subscribed and sworn to before me
19	A. Two hours is fine with me.	19	
20	Q. I just want the truth.	20	this day of 20
21	A. Two hours is fine.	21	20
22	O. Two hours?	22	
23	A. Sure.	23	
		24	MODERNY DUDY TO
24	Q. And your understanding is that this		NOTARY PUBLIC
25	contract was the culmination of the conversations	25	
	Page 307		Page 309
1	$$\operatorname{Page}307$$ that you had had with Mr. Guo about the	1	Page 309 ERRATA SHEET
1 2	e e e e e e e e e e e e e e e e e e e	1 2	
	that you had had with Mr. Guo about the		
2	that you had had with Mr. Guo about the investigative services that Strategic was going	2	ERRATA SHEET
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1	Page 310	
2	REPORTER'S CERTIFICATE	
	CHARL OF MEN YORK	
3	STATE OF NEW YORK )	
4	) ss.	
5	COUNTY OF NEW YORK )	
6		
7	I, ROBERTA CAIOLA, a Shorthand Reporter	
8	and Notary Public within and for the State of New	
9	York, do hereby certify:	
10	That FRENCH WALLOP, the witness whose	
11	deposition is hereinbefore set forth, was duly	
12	sworn by me and that such deposition is a true	
13	record of the testimony given by such witness.	
14	I further certify that I am not related	
15	to any of the parties to this action by blood or	
16	marriage and that I am in no way interested in	
17	the outcome of this matter.	
18	In witness whereof, I have hereunto set	
19	my hand on this date, February 21, 2019.	
20		
21	Pobeta Carde,	
22		
23	ROBERTA CAIOLA	
24		
25		
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